Onspoed Prospecting Feasibility Assessment

City of Tshwane Metropolitan Municipality, Gauteng Province

Farm: Portion 28 Onspoed 500-JR

Palaeontological Impact Assessment: Desktop Study

Facilitated by: Tsimba Archaeological Footprints

24 Lawson Mansions, 74 Loveday Street,

Johannesburg, 2000

Tel: 061 912 5118

2020/12/17

Regisaurus (ESI) (H. Fourie)

B. Executive summary

Outline of the development project: Tsimba Archaeological Footprints (Pty) Ltd has been appointed by Myezo Environmental Management Services (Pty) Ltd to undertake a Palaeontological Impact Assessment (PIA), Desktop Study of the suitability of Onspoed Prospecting Feasibility Assessment in the City of Tshwane Metropolitan Municipality, Gauteng Province on the Farm Portion28 of Onspoed 500-JR.

The applicant, Nichume Operations (Pty) Ltd proposes to prospect for and mine coal.

The Project includes one Site (see map):
Site: A rectangular area outlined in red with the Wilgerivier to the north, Balmoral to the south-east and Bronkhorstspruit to the south-west. The approximate size of the site is 21.0 hectares.

Legal requirements:-

The **National Heritage Resources Act (Act No. 25 of 1999) (NHRA)** requires that all heritage resources, that is, all places or objects of aesthetic, architectural, historical, scientific, social, spiritual, linguistic or technological value or significance are protected. The Republic of South Africa (RSA) has a remarkably rich fossil record that stretches back in time for some 3.5 billion years and must be protected for its scientific value. Fossil heritage of national and international significance is found within all provinces of the RSA. South Africa's unique and non-renewable palaeontological heritage is protected in terms of the National Heritage Resources Act. According to this act, palaeontological resources may not be excavated, damaged, destroyed or otherwise impacted by any development without prior assessment and without a permit from the relevant heritage resources authority.

The main aim of the assessment process is to document resources in the development area and identify both the negative and positive impacts that the development brings to the receiving environment. The PIA therefore identifies palaeontological resources in the area to be developed and makes recommendations for protection or mitigation of these resources.

"palaeontological" means 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 traces.

For this study, resources such as geological maps, scientific literature, institutional fossil collections, satellite images, aerial maps and topographical maps were used. It provides an assessment of the observed or inferred palaeontological heritage within the study area, with recommendations (if any) for further specialist palaeontological input where this is considered necessary.

A Palaeontological Impact Assessment is generally warranted where rock units of **LOW** to **VERY HIGH** palaeontological sensitivity are concerned, levels of bedrock exposure within the study area are adequate; large scale projects with high potential heritage impact are planned; and where the distribution and nature of fossil remains in the proposed area is unknown. The specialist will inform whether further monitoring and mitigation are necessary.

Types and ranges of heritage resources as outlined in Section 3 of the National Heritage Resources Act (Act No.25 of 1999):
(i) (i) objects recovered from the soil or waters of South Africa, including archaeological and palaeontological objects and material, meteorites and rare geological specimens.
This report adheres to the guidelines of Section 38 (1) of the National Heritage Resources Act (Act No. 25 of 1999).
Subject to the provisions of subsections (7), (8) and (9), any person who intends to undertake a development categorised as (a) the construction of a road, wall, power line, pipeline, canal or other similar form of linear development or barrier exceeding 300 m in length; (b) the construction of a bridge or similar structure exceeding 50 m in length; (c) any development or other activity which will change the character of a site (see Section 38); (d) the re-zoning of a site exceeding 10 000 m² (1 ha) in extent; (e) or any other category of development provided for in regulations by SAHRA or a PHRA authority.

This report (**1c)** aims to provide comment and recommendations on the potential impacts that the proposed development could have on the fossil heritage of the area and to state if any mitigation or conservation measures are necessary.

Outline of the geology and the palaeontology:
The geology was obtained from map 1:100 000, Geology of the Republic of South Africa (Visser 1984) and 2528 Pretoria, 1:250 000 geological map (Walraven 1978) (Myezo).

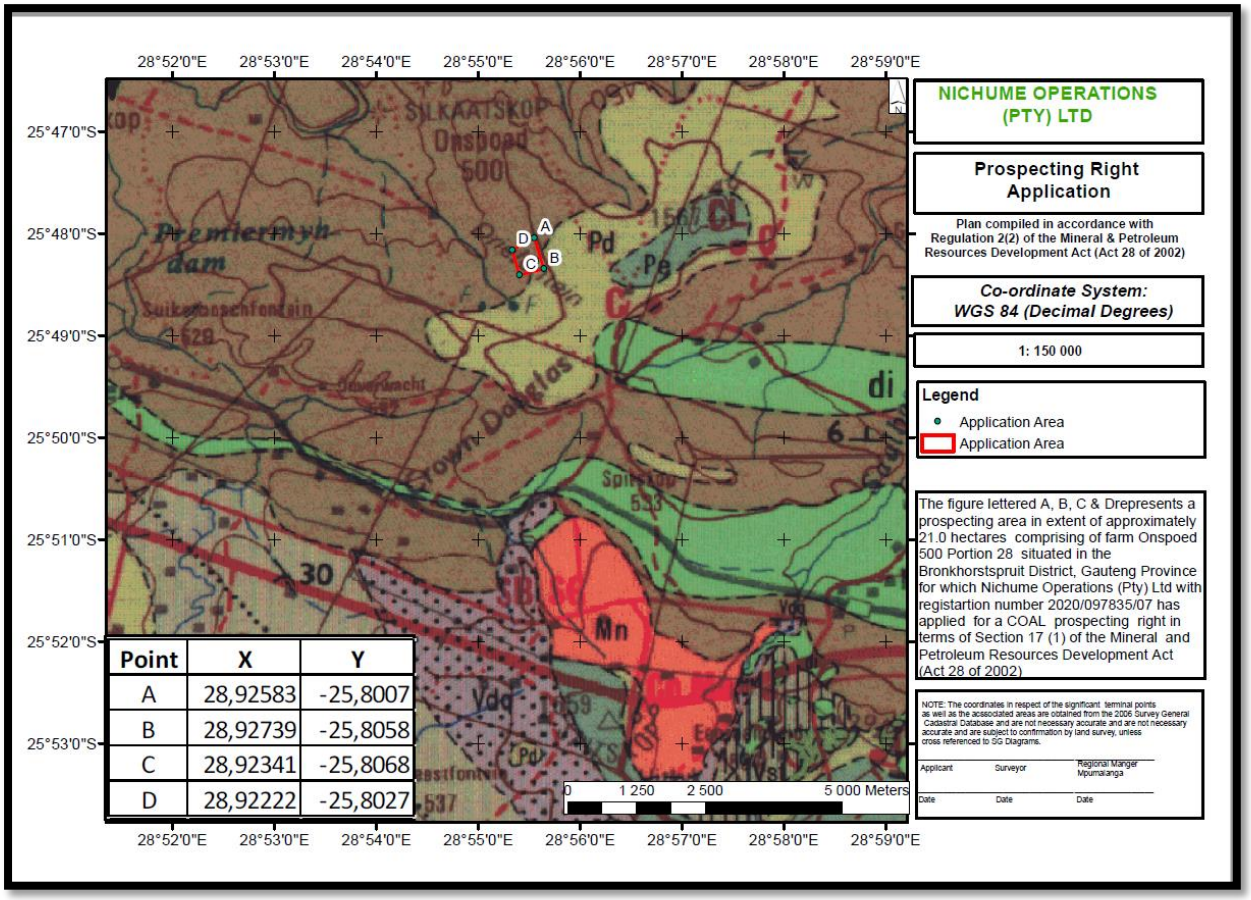

Figure 3: The geology of the development area.
Legend to Map and short explanation.
Pd – Tillite, shale (khaki). Dwyka Group, Karoo Supergroup. Carboniferous.
Mw – Sandstone, quartzite in places; conglomerate (dark brown). Wilgerivier Formation, Waterberg Group. Mockolian.
…… – (black) Lineament (Possible dyke).
--f— Fault.
⊥15˚ - Strike and dip.
□ - Proposed development (in red with A,B,C,D on Figure).

The Waterberg Group of rocks today occurs in several separate regions: in the Limpopo and Mpumalanga Provinces. These separate patches probably originally formed a single sheet of sedimentary rocks that since became fragmented as a result of erosion. A deep red iron oxide is responsible for the colouration. As the rocks are chemically resistant and very hard, they produce spectacular cliffs and mountainous topography (McCarthy and Rubidge 2005). The Waterberg Group (Kent 1980) is known for its reddish sandstone with conglomerates present between Pretoria and Middelburg, it is older than the coal and younger than the Magaliesberg Quartzite Formation. In the Cullinan-Middelburg base only one formation has been recognised, the unconformable

Wilgerivier Formation. A threefold subdivision is recognised, the Nylstroom, Matlabas and Kransberg Subgroups. It overlies the Loskop Formation.

Palaeontology – Fossils in South Africa mainly occur in rocks of sedimentary nature and not in rocks from igneous or metamorphic nature. Therefore, if there is the presence of Karoo Supergroup strata the palaeontological sensitivity can generally be **LOW** to **VERY HIGH**, and here locally **MODERATE** for the Dwyka Group and **LOW** for the Waterberg Group (SG 2.2 SAHRA APMHOB, 2012).

The Dwyka Group rocks are to the east of the project. Trace fossils are relatively abundant in the shales occurring near the top of the Dwyka Group. Lycopods (*Leptophloem australe*) have been described from the northern Free State (Mac Rae 1999). Spores and acritarchs have been reported from the interglacial mudrocks of the Dwyka Group, also pollen, wood, and plant remains in the interbedded mudrocks as well as the diamictite itself, while anthropod trackways and fish trails are present in places on bedding planes (Visser *et al.* 1990).

Trace fossils are found in the Waterberg Group. Snyman (1996) places the age as 1 800 Ma till 1 700 Ma (Mokolian).

Summary of findings (**1d**): The Desktop Study was undertaken in December 2020 in the summer in dry and hot conditions during the official Level 1 Covid-19 lockdown, and the following is reported, as this is a desktop study the season has no influence:

The Project includes one locality Site (see map) with a **LOW** sensitivity:
Site: A rectangular area outlined in red with the Wilgerivier to the north, Balmoral to the south-east and Bronkhorstspruit to the south-west. The approximate size of the site is 21.0 hectares.

Other locality sites will not be feasible as long as the drilling is confined to the Waterberg sediments probably penetrating the coal seams.
It is not sure why the Waterberg will be drilled, it is 2000 m. thick and does not overlie the Vryheid Formation which is mined for coal in the Mpumalanga Province.

Recommendation:
The potential impact of the development on fossil heritage is **LOW** and therefore a Phase 1: Field Survey is not necessary for this development (according to SAHRA protocol), but if a chance fossil is found during prospecting a Phase 1 Palaeontological Impact Assessment and Phase 2: Mitigation or conservation will be necessary.

Concerns/threats **(1g)** to be added to EMPr:

1. Threats to the National Heritage are earth moving equipment/machinery (for example haul trucks, front end loaders, excavators, graders, dozers) during construction, the sealing-in, disturbance, damage or destruction of the fossils by development, vehicle traffic, clearing, prospecting, mining, and human disturbance.
2. Special care must be taken during the clearing, digging, drilling, blasting and excavating of foundations, trenches, channels and footings and removal of overburden not to intrude fossiliferous layers.

The recommendations are (**1ni,1niA,1nii**):

1. Mitigation may be needed if fossils are found during prospecting.
2. No consultation with parties was necessary. The Environmental Control Officer must familiarise him- or herself with the formation present and its fossils.

3. The development may go ahead. The ECO must survey for fossils before and or after clearing, blasting or excavating and keep a photographic record.
4. The EMPr already covers the conservation of heritage and palaeontological material that may be exposed during construction activities. For a chance find, the protocol is to immediately cease all construction activities, construct a 30 m no-go barrier, and contact SAHRA for further investigation.

Stakeholders: Developer – Nichume Operations (Pty) Ltd.
Environmental – Myezo Environmental Management Services (Pty)
Landowner – N/a.

C. Table of Contents

D. Background information on the project

Report

This report is part of the environmental impact assessment process under the National Environmental Management Act, as amended (Act No. 107 of 1998) (NEMA) and includes Appendix 6 (May 2019) of the Environmental Impact Assessment Regulations (see Appendix 2). It also is in compliance with The Minimum Standards for Palaeontological Components of Heritage Impact Assessment Reports, SAHRA, APMHOB, Guidelines 2012, Pp 1-15 (**2)**.

Outline of development (**1f)**

This report discusses and aims to provide the developer with information regarding the location of palaeontological material that will be impacted by the development. In the pre-construction phase it is necessary for the developer to apply for the relevant permit from the South African Heritage Resources Agency (SAHRA / PHRA).

The applicant, Nichume Operations (Pty) Ltd proposes to prospect for and mine coal.

Related Infrastructure:

1. Access road,
2. Temporary buildings,
3. Water supply,
4. Wastewater and sewage disposal with reticulation to septic tank,

5. Power supply,
6. Fence and Security.

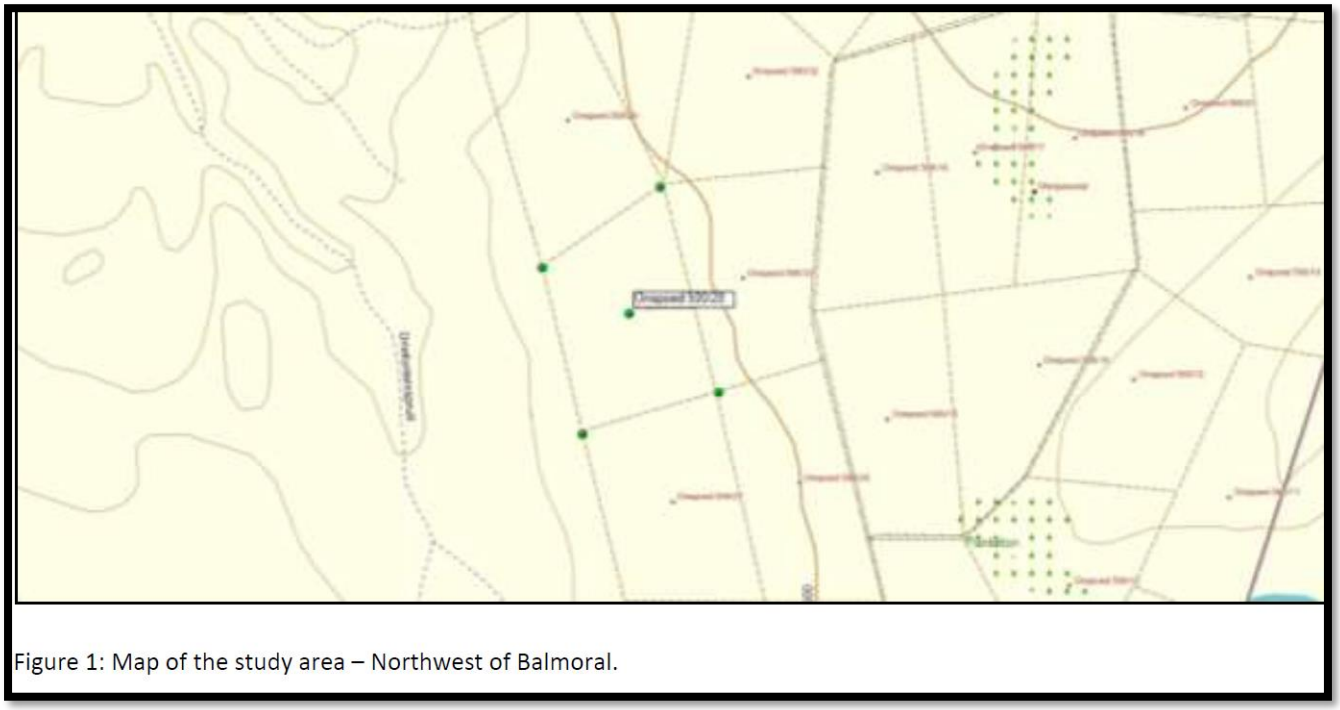

Figure 1: Figure showing location (BioAssets)

The Project includes one Site (see map):
Site: A rectangular area outlined in red with the Wilgerivier to the north, Balmoral to the south-east and Bronkhorstspruit to the south-west. The approximate size of the site is 21.0 hectares.

Rezoning/ and or subdivision of land: No.
Name of Developer and Consultant: Nichume Operations (Pty) Ltd and Myezo Environmental Management Services (Pty).
Terms of reference: Dr H. Fourie is a palaeontologist commissioned to do a palaeontological impact assessment: field study to ascertain if any palaeontological sensitive material is present in the development area. This study will advise on the impact on fossil heritage mitigation or conservation necessary, if any.
Short *Curriculum vitae:(**1ai, 1aii)*** Dr Fourie obtained a Ph.D from the Bernard Price Institute for Palaeontological Research (now ESI), University of the Witwatersrand. Her undergraduate degree is in Geology and Zoology. She specialises in vertebrate morphology and function concentrating on the Therapsid Therocephalia. At present she is curator of a large fossil invertebrate, Therapsid, dinosaur, amphibia, fish, reptile, and plant collections at Ditsong: National Museum of Natural History. For the past 14 years she carried out field work in the North West, Western Cape, Northern Cape, Eastern Cape, Limpopo, Mpumalanga, Gauteng and Free State Provinces and has done more than 200 PIA's since 2012. Dr Fourie has been employed at the Ditsong: National Museum of Natural History in Pretoria (formerly Transvaal Museum) for 26 years.
Legislative requirements: South African Heritage Resources Agency (SAHRA) for issue of permits if necessary. National Heritage Resources Act (Act No. 25 of 1999). An electronic copy of this report must be supplied to SAHRA (**2**).

E. Description of property or affected environment
Location and depth:

The Proposed suitability of Onspoed Prospecting Feasibility Assessment will be situated in the City of Tshwane Metropolitan Municipality, Gauteng Province on the Farm Portion 28 of Onspoed 500-JR.

Depth is determined by the infrastructure to be developed and the thickness of the formation in the development area, in this instance the related infrastructure. Details of the location and distribution of all significant fossil sites or key fossiliferous rock units are often difficult to determine due to thick topsoil, subsoil, overburden and alluvium. Depth of the overburden may vary a lot. Geological maps do not provide depth or superficial cover, it only provides mappable surface outcrops. The Waterberg Formation reaches a depth of 2000 m. (Figure 2).

The Project includes one Site (see map):
Site: A rectangular area outlined in red with the Wilgerivier to the north, Balmoral to the south-east and Bronkhorstspruit to the south-west. The approximate size of the site is 21.0 hectares.

Figure 2: Google.earth image showing location (Myezo).

The bulk of the site is underlain by the Waterberg Group rocks.

F. Description of the Geological Setting

Description of the rock units:

Large areas of the southern African continent are covered by the Karoo Supergroup (Figure 3). It covers older geological formations with an almost horizontal blanket. Several basins are present with the main basin in the central part of south Africa and several smaller basins towards Lebombo, Springbok Flats and Soutpansberg. An estimated age is 150 – 180 Ma. And a maximum thickness of 7000 m is reached in the south. Three formations overlie the Beaufort Group, they are the Molteno, Elliot and Clarens Formations. The Elliot Formation is also known as the Red Beds and the old Cave Sandstone is known as the Clarens Formation. At the top is the Drakensberg Basalt Formation with its pillow lavas, pyroclasts, etc. (Kent 1980, Snyman 1996).

The Dwyka Group is the lowermost unit of the Karoo Supergroup overlain by the Ecca Group and underlain by the Witteberg Group, Bokkeveld or Table Mountain Groups and various other groups. It ranges in age from Late Carboniferous to early Permian. Clastic rocks containing diamictite, varved shale, conglomerate, pebbly sandstone and mudrock are present. The rocks display features reflecting a glacial and glacially-related origin (Kent 1980, Visser *et al.* 1990). Thickness varies between 100-800 m (Visser *et al.* 1990). As Gondwana drifted northward the first sediments to be deposited would have been the Dwyka. As the glaciers melted they left striations on the surface also vast quantities of mud and large fragments of rock which formed the characteristic, poorly sorted Dwyka tillite (McCarthy and Rubidge 2005). Visser *et al.* (1990) proposed two subdivisions for the Dwyka Group in the main Karoo basin, the Elandsvlei and Mbizane Formations. In the far north, the Tshidzi and Wellington Formations also form part of the Dwyka Group. Fossils are present.

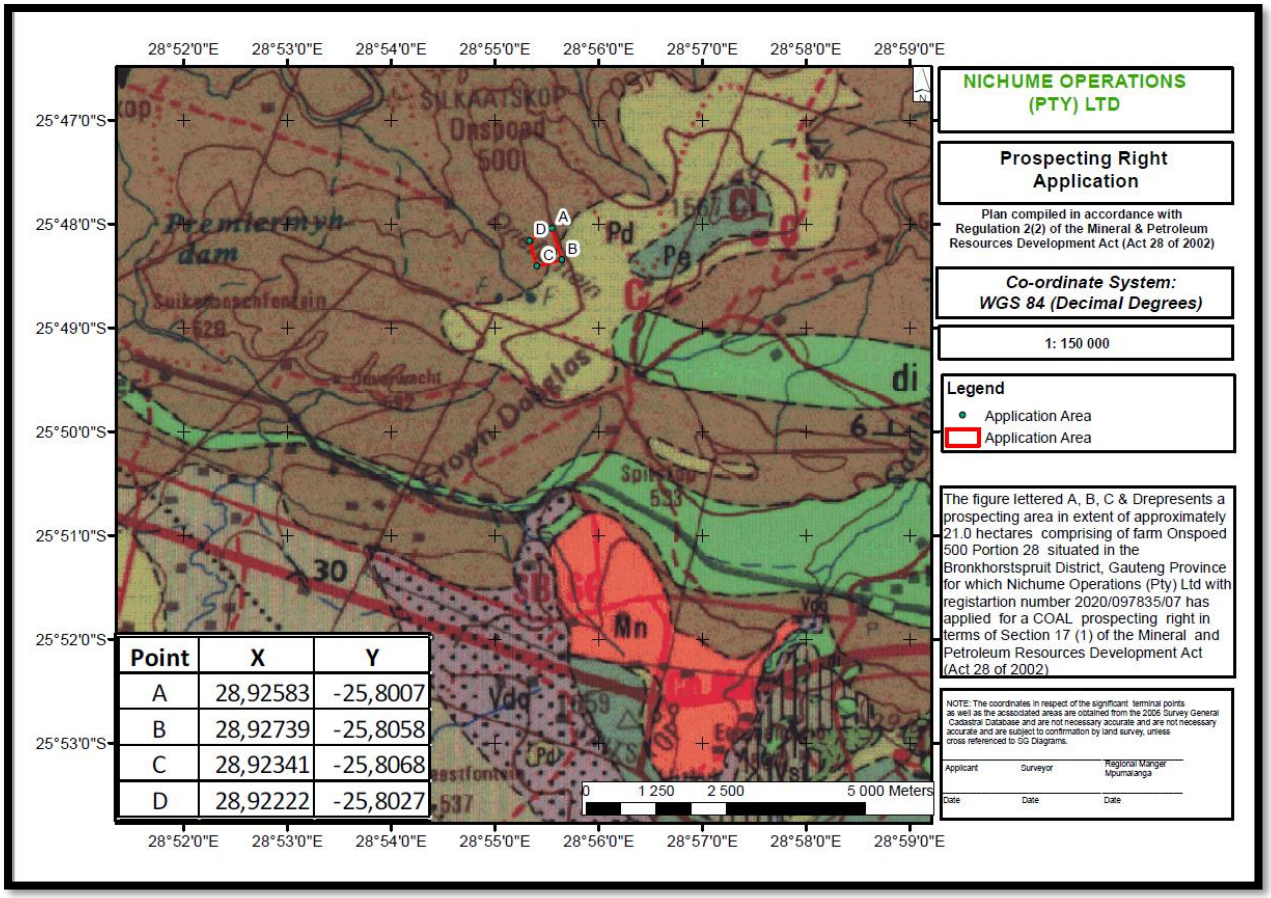

Figure 3: Geology of the development area (Walraven 1978 (**1h**).

Legend to Map and short explanation.

Pd – Tillite, shale (khaki). Dwyka Group, Karoo Supergroup. Carboniferous.

Mw – Sandstone, quartzite in places; conglomerate (dark brown). Wilgerivier Formation, Waterberg Group. Mockolian.

…… – (black) Lineament (Possible dyke).

--f— Fault.

⊥15˚ - Strike and dip.

□ – Approximate position of farm (blocked in red with A,B,C,D).

Mining Activities on Figure above:

C - Coal.

The Waterberg Group of rocks today occurs in several separate regions: in the Limpopo and Mpumalanga Provinces. These separate patches probably originally formed a single sheet of sedimentary rocks that since became fragmented as a result of erosion. This sheet covers an area of 20 000 km ^{2}. A deep red iron oxide is responsible for the colouration. As the rocks are chemically resistant and very hard, they produce spectacular cliffs and mountainous topography (McCarthy and Rubidge 2005). The Waterberg Group (Kent 1980) is known for its reddish sandstone with conglomerates present between Pretoria and Middelburg, it is older than the coal and younger than the Magaliesberg Quartzite Formation. In the Cullinan-Middelburg base only one formation has been recognised, the unconformable Wilgerivier Formation. Trace fossils are found in the Waterberg Group. Snyman (1996) places the age as 1 800 Ma till 1 700 Ma (Mokolian). A threefold subdivision is recognised, the Nylstroom, Matlabas and Kransberg Subgroups in the main basin. It overlies the Loskop Formation (Kent 1980, Visser 1989).

The succession in the early Waterberg basin bordered by the Waterberge and Sandriviersberge (the Nylstroom protobasin and Alma trough) comprises the Swaershoek sandstone and Alma graywacke Formations. The Swaershoek Formation extends over the entire Nylstroom syncline and the northern slopes of the Swaershoekberge and the Hoekberge. It overlies the Rooiberg Group of the Transvaal Supergroup (Kent 1980). This formation forms the base of the Waterberg Group with a maximum thickness of 2500 m (Visser 1989). The Wilgerivier Formation is discordant on the Pretoria Group, Selonsrivier Formation and Loskop Formation. It is often covered with Karoo rocks and reaches a thickness of 2000 m. (Visser 1989).

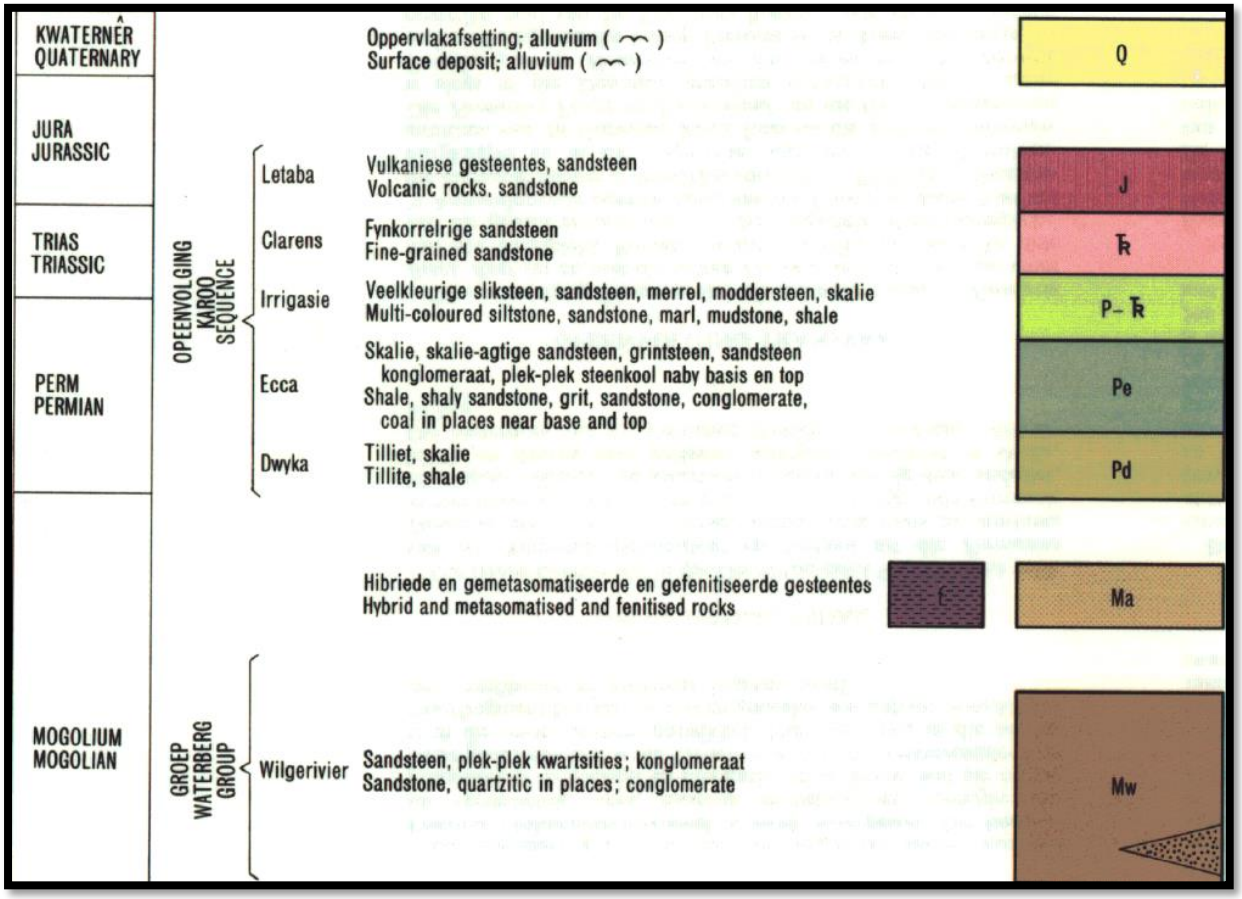

Figure 4: Lithostratigraphic column (Walraven 1978)

Dolerite dykes (Jd) occur throughout the Karoo Supergroup. Structural geological features such as dykes and faults can have a measurable influence on ground water flow and mass transport. Permian sediments are

extensively intruded and thermally metamorphosed (baked) by subhorizontal sills and steeply inclined dykes of the Karoo Dolerite Suite (Jd). These early Jurassic (183 Ma) basic intrusions baked the adjacent mudrocks and sandstones to form splintery hornfels and quartzites respectively. Thermal metamorphism by dolerite intrusions tends to reduce the palaeontological heritage potential of the adjacent sediments.

G. Background to Palaeontology of the area

Summary: When rock units of moderate to very high palaeontological sensitivity are present within the development footprint, a desk top and or field scoping (survey) study by a professional palaeontologist is usually warranted. The main purpose of a field scoping (survey) study would be to identify any areas within the development footprint where specialist palaeontological mitigation during the construction phase may be required (SG 2.2 SAHRA AMPHOB, 2012).

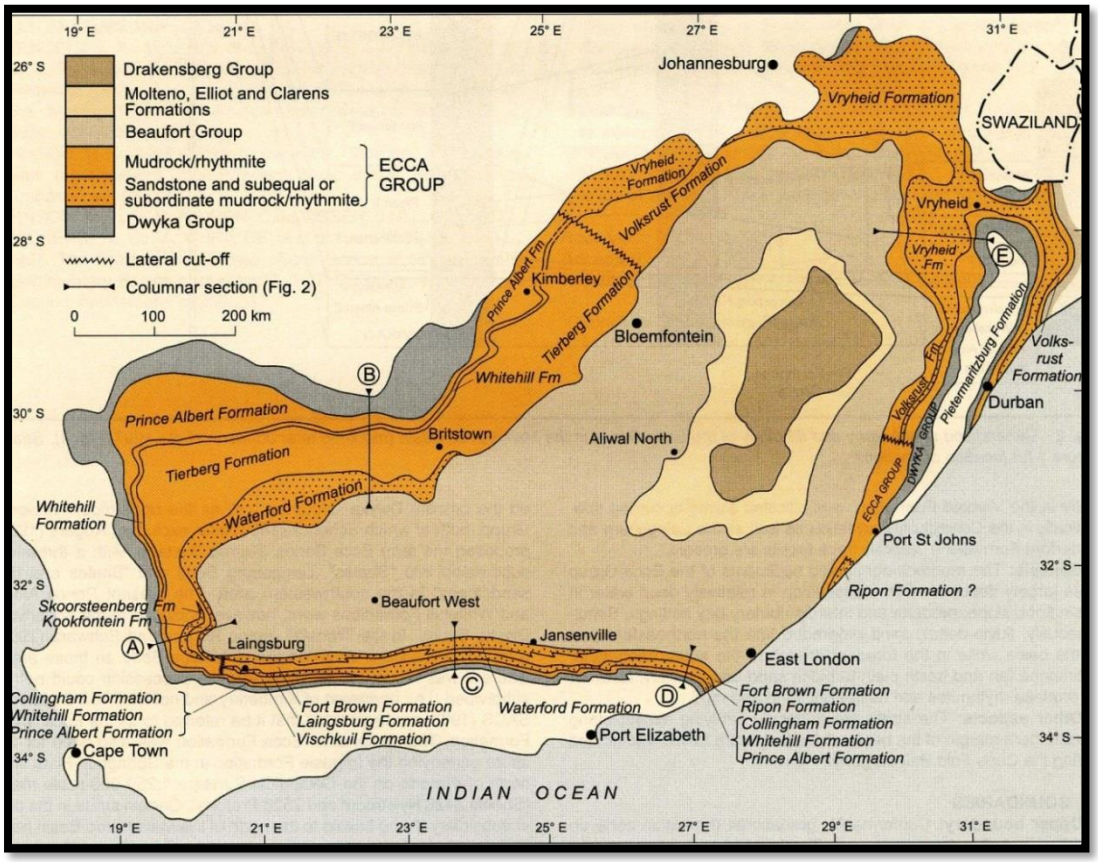

Figure 5: Extent of the Karoo Supergroup (Johnson 2009).

Fossils in South Africa mainly occur in rocks of sedimentary nature and not in rocks from igneous or metamorphic nature. Therefore, if there is the presence of Karoo Supergroup strata the palaeontological sensitivity is generally **LOW** to **VERY HIGH**.

The rocks of the Karoo Supergroup are internationally acclaimed for their richness and diversity of fossils. Trace fossils are relatively abundant in the shales occurring near the top of the Dwyka Group. Lycopods (*Leptophloem australe*) have been described from the northern Free State (Mac Rae 1999). Spores and acritarchs have been reported from the interglacial mudrocks of the Dwyka Group, also pollen, wood, and plant remains in the interbedded mudrocks as well as the diamictite itself, while anthropod trackways and fish trails are present in places on bedding planes (Visser *et al.* 1990).

Trace fossils are found in the Waterberg Group. Snyman (1996) places the age as 1 800 Ma till 1 700 Ma (Mokolian).

Table 1: Taken from Palaeotechnical Report (Almond, *et al.* 2009) (**1cA)**.

DWYKA (C-Pd)		Probably Mbizane		Glacial to fluvioglacial diamictites, conglomerates, sandstones, shales Late Carboniferous to Early Permian in age	Possibility of interglacial or post-glacial trace fossil assemblages, fossil plants, shelly invertebrates – but these fossils not yet recorded from Gauteng	
CULLINAN				Kimberlite pipes (igneous intrusions) e.g. Cullinan Province (1200 Ma / Mesoproterozoic)	No fossils recorded	No crater facies preserved and therefore no fossils. Fossiliferous crater lake deposits in Northern Cape, Botswana
F(purple); Ma; s; di; Mk; Mm; Mn; Mr		Mt; Md; Ms; Ma; s; di; Mk; Mm; Mn; Mr; Mg; Msy; Mle; M5; M30; r; r1; r2 r3; r4; Timbavati Gabbros (Mti; ti); M2; M4; M7		Various igneous intrusives Middle Proterozoic	No fossils recorded. Some of these intrusions are related to the Pilansberg Alkaline Province	
WATERBERG		Wilgerivier (Mw)		Continental "red beds" - predominantly braided stream deposits (sandstones, conglomerates with minor mudrocks), also beach, tidal flat, lacustrine, aeolian and possible marine shelf sediments Early to Mid Proterozoic (Mokolian) c. 2 to 1.7 Ga	Earliest known terrestrial cyanobacterial mats recorded from playa lake deposits of the Makgabeng Fm (Waterberg Group) (1.8 Ga) in Limpopo and might also occur in Gauteng	Early Proterozoic "red beds" provide evidence for the development of an oxygenated atmosphere after c. 2Ga Vrw, Vls previously included within the uppermost Pretoria Group but are now regarded as proto-Waterberg units.
		Rust de Winter (Vrw) Loskop (Vls) h; l		Shale, sandstone, conglomerate and volcanic rocks		

Table 2: Criteria used (Fossil Heritage Layer Browser/SAHRA) (**1cB)**:

Rock Unit	Significance/vulnerability	Recommended Action
Dwyka Group	Moderate	Desktop study required
Waterberg Group	Low	No action required, but a protocol for finds is required

Databases and collections: Ditsong: National Museum of Natural History. Evolutionary Studies Institute, University of the Witwatersrand (ESI).

Impact: **LOW** for the Waterberg Group. There may be significant fossil resources that may be impacted by the development (mudstone, shale) and if destroyed are no longer available for scientific research or other public good (Almond, *et al.* 2009).

The Project includes one Site (see map) with a **LOW** sensitivity (**1j)**:

Site: A rectangular area outlined in red with the Wilgerivier to the north, Balmoral to the south-east and Bronkhorstspruit to the south-west. The approximate size of the site is 21.0 hectares.

H. Description of the Methodology (1e)

The palaeontological impact assessment desktop study was undertaken in December 2020 during the official Level 1 of the Covid-19 lockdown. A Phase 1: Field Study includes a survey of the affected portion with photographs taken (in 7.1 mega pixels) of the site with a digital camera (Canon PowerShot A470). Additionally, a Global Positioning System (GPS) (Garmin eTrex 10) is used to record fossiliferous finds and outcrops (bedrock) when the area is not covered with topsoil, subsoil, overburden, vegetation, grassland, trees or waste. The survey did identify the Karoo Supergroup. A literature survey is included and the study relied heavily on geological maps.

SAHRA document 7/6/9/2/1 requires track records/logs from archaeologists not palaeontologists as palaeontologists concentrate on outcrops which may be recorded with a GPS. Isolated occurrences of rocks usually do not constitute an outcrop. Fossils can occur in dongas, as nodules, in fresh rock exposures, and in riverbeds. Finding fossils require the experience and technical knowledge of the professional palaeontologist, but that does not mean that an amateur can't find fossils. The geology of the region is used to predict what type of fossil and zone will be found in any particular region. Archaeozoologists concentrate on more recent fossils in the quaternary and tertiary deposits.

Assumptions and Limitations (**1i)**:-
The accuracy and reliability of the report **may be** limited by the following constraints:

1. Most development areas have never been surveyed by a palaeontologist or geophysicist.
2. Variable accuracy of geological maps and associated information.
3. Poor locality information on sheet explanations for geological maps.
4. Lack of published data.
5. Lack of rocky outcrops.
6. Inaccessibility of site.
7. Insufficient data from developer and exact lay-out plan for all structures.

A Phase 2 Palaeontological Impact Assessment: Mitigation will include:

1. Recommendations for the future of the site.
2. Description of work done (including number of people and their responsibilities.
3. A written assessment of the work done, fossils excavated, not removed or collected and observed.
4. Conclusion reached regarding the fossil material.
5. A detailed site plan.
6. Possible declaration as a heritage site or Site Management Plan.

The National Heritage Resources Act No. 25 of 1999 further prescribes.

Act No. 25 of 1999. National Heritage Resources Act, 1999.
National Estate: 3 (2) (f) archaeological and palaeontological sites,
(i)(1) objects recovered from the soil or waters of South Africa, including archaeological and palaeontological objects and material, meteorites and rare geological specimens,
Heritage assessment criteria and grading: (a) Grade 1: Heritage resources with qualities so exceptional that they are of special national significance;
(b) Grade 2: Heritage resources which, although forming part of the national estate, can be considered to have special qualities which make them significant within the context of a province or a region; and (c) Grade 3: Other heritage resources worthy of conservation.
SAHRA is responsible for the identification and management of Grade 1 heritage resources.
Provincial Heritage Resources Authority (PHRA) identifies and manages Grade 2 heritage resources.
Local authorities identify and manage Grade 3 heritage resources.

No person may damage, deface, excavate, alter, remove from its original position, subdivide or change the planning status of a provincially protected place or object without a permit issued by a heritage resources authority or local authority responsible for the provincial protection.
Archaeology, palaeontology and meteorites: Section 35.
(2) Subject to the provisions of subsection (8) (a), all archaeological objects, palaeontological material and meteorites are the property of the State.

(3) Any person who discovers archaeological or palaeontological objects or material or a meteorite in the course of development or agricultural activity must immediately report the find to the responsible heritage resources authority, or to the nearest local authority offices or museum, which must immediately notify such heritage resources authority.

Mitigation involves planning the protection of significant fossil sites, rock units or other palaeontological resources and/or excavation, recording and sampling of fossil heritage that might be lost during development, together with pertinent geological data. The mitigation may take place before and / or during the construction phase of development. The specialist will require a Phase 2 mitigation permit from the relevant Heritage Resources Authority before a Phase 2 may be implemented.

The Mitigation is done in order to rescue representative fossil material from the study area to allow and record the nature of each locality and establish its age before it is destroyed and to make samples accessible for future research. It also interprets the evidence recovered to allow for education of the public and promotion of palaeontological heritage.

Should further fossil material be discovered during the course of the development (*e. g.* during bedrock excavations), this must be safeguarded, where feasible *in situ,* and reported to a palaeontologist or to the Heritage Resources authority. In situations where the area is considered palaeontologically sensitive (*e. g.* Karoo Supergroup Formations, ancient marine deposits in the interior or along the coast) the palaeontologist might need to monitor all newly excavated bedrock. The developer needs to give the palaeontologist sufficient time to assess and document the finds and, if necessary, to rescue a representative sample.

When a Phase 2 palaeontological impact study is recommended, permission for the development to proceed can be given only once the heritage resources authority has received and approved a Phase 2 report and is satisfied that (a) the palaeontological resources under threat have been adequately recorded and sampled, and (b) adequate development on fossil heritage, including, where necessary, *in situ* conservation of heritage of high significance. Careful planning, including early consultation with a palaeontologist and heritage management authorities, can minimise the impact of palaeontological surveys on development projects by selecting options that cause the least amount of inconvenience and delay.

Three types of permits are available; Mitigation, Destruction and Interpretation. The specialist will apply for the permit at the beginning of the process (SAHRA 2012).

I. Description of significant fossil occurrences

All Karoo Supergroup geological formations are ranked as **LOW** to **VERY HIGH**, and here the impact is potentially **MODERATE** for the Dwyka Group and **LOW** for the Waterberg Group.

Trace fossils are relatively abundant in the shales occurring near the top of the Dwyka Group. Lycopods (*Leptophloem australe*) have been described from the northern Free State (Mac Rae 1999). Spores and acritarchs have been reported from the interglacial mudrocks of the Dwyka Group, also pollen, wood, and plant remains in the interbedded mudrocks as well as the diamictite itself, while anthropod trackways and fish trails are present in places on bedding planes (Visser *et al.* 1990).

Trace fossils are found in the Waterberg Group. Snyman (1996) places the age as 1 800 Ma till 1 700 Ma (Mokolian).

Details of the location and distribution of all significant fossil sites or key fossiliferous rock units are often difficult to be determined due to thick topsoil, subsoil, overburden and alluvium. Depth of the overburden may vary a lot.

The threats are:-

- Earth moving equipment/machinery (front end loaders, excavators, graders, dozers) during construction,
- The sealing-in or destruction of fossils by development, vehicle traffic, and human disturbance. See Description of the Geological Setting (F) above.

J. Recommendation (1o,1p,1q)

a. There is no objection (see Recommendation B) to the development, it is not necessary to request a Phase 1 Palaeontological Impact Assessment: Field Study to determine whether the development will affect fossiliferous outcrops, but if a chance fossil is found during prospecting a Phase 1 Palaeontological Field Study is required and a Phase 2 Palaeontological Assessment: Mitigation. Protocol is attached (Appendix 2).
b. This project may benefit the economy, the life expectancy of the community, the growth of the community and social development in general.
c. Preferred choice: Only one Site is presented. The palaeontological sensitivity is **LOW**.
d. The following should be conserved: if any palaeontological material is exposed during clearing, digging, excavating, drilling or blasting SAHRA must be notified. All construction activities must be stopped, a 30 m no-go barrier constructed and a palaeontologist should be called in to determine proper mitigation measures.
e. No consultation with parties was necessary.

Sampling and collecting **(1m,1k)**:
Wherefore a permit is needed from the South African Heritage Resources Agency (SAHRA / PHRA).

a. Objections: Cautious. See heritage value and recommendation.
b. Conditions of development: See Recommendation.
c. Areas that may need a permit: Yes, if a fossil is found.
d. Permits for mitigation: **Needed from SAHRA/PHRA prior to Mitigation**.

K. Conclusions

a. All the land involved in the development was assessed and none of the property is unsuitable for development (see Recommendation B).
b. All information needed for the Palaeontological Impact Assessment was provided by the Consultant. All technical information was provided by Myezo Environmental Management Services (Pty)
c. Areas that would involve mitigation and may need a permit from the South African Heritage Resources Agency are discussed.
d. The following should be conserved: if any palaeontological material is exposed during digging, excavating, drilling or blasting, SAHRA must be notified. All development activities must be stopped and a palaeontologist should be called in to determine proper mitigation measures. Especially shallow caves.
e. Condition in which development may proceed: It is further suggested that a Section 37(2) agreement of the Occupational, Health and Safety Act 85 of 1993 is signed with the relevant contractors to protect the environment (fossils) and adjacent areas as well as for safety and security reasons.
f. It is not sure why the Waterberg will be drilled, it is 2000 m. thick and does not overlie the Vryheid Formation which is mined for coal in the Mpumalanga Province.

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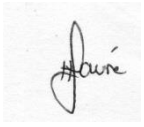
Declaration / disclaimer (1b)

I, Heidi Fourie, declare that I am an independent consultant and have no business, financial, personal or other interest in the proposed development project for which I was appointed to do a palaeontological assessment. There are no circumstances that compromise the objectivity of me performing such work.

I accept no liability, and the client, by receiving this document, indemnifies me against all actions, claims, demands, losses, liabilities, costs, damages and expenses arising from or in connection with services rendered, directly or indirectly by the use of the information contained in this document.

It may be possible that the Palaeontological Impact Assessment may have missed palaeontological resources in the project area as outcrops are not always present or visible while others may lie below the overburden of earth and may only be present once development commences.

This report may not be altered in any way and any parts drawn from this report must make reference to this report.



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Heidi Fourie
2020/12/17

Appendix 1: **Protocol for Chance Finds and Management Plan (also include Section B) (1k,1l,1m)**

This section covers the recommended protocol for a Phase 2 Mitigation process as well as for reports where the Palaeontological Sensitivity is **LOW**; this process guides the palaeontologist / palaeobotanist on site and should not be attempted by the layman / developer. As part of the Environmental Authorisation conditions, an Environmental Control Officer (ECO) will be appointed to oversee the construction activities in line with the legally binding Environmental Management Programme (EMPr). The EMPr already covers the conservation of heritage and palaeontological material that may be exposed during construction activities:

- For a chance find, the protocol is to immediately cease all construction activities, construct a 30 m no-go barrier, and contact SAHRA for further investigation.
- Construction workers must be informed that this is a no-go area. Any fossil find must be placed in a safe area.
- It is recommended that the EMPr be updated to include the involvement of a palaeontologist for pre-construction training of the ECO and during the digging and excavation phase of the development.
- The ECO must visit the site after clearing, excavations, blasting or drilling and keep a photographic record.
- The developer may have to survey the areas affected by the development and indicate on plan where the construction / development may take place. Trenches have to be dug to ascertain how deep the sediments are above the bedrock (can be a few hundred metres). This will give an indication of the depth of the topsoil, subsoil, and overburden, if need be trenches should be dug deeper to expose the interburden.

Mitigation will involve recording, rescue and judicious sampling of the fossil material present in the layers sandwiched between the geological / coal layers. It must include information on number of taxa, fossil abundance, preservational style, and taphonomy. This can only be done during mining or excavations. In order for this to happen, in case of coal mining operations, the process will have to be closely scrutinised by a professional palaeontologist / palaeobotanist to ensure that only the coal layers are mined and the interlayers (siltstone and mudstone) are surveyed for fossils or representative sampling of fossils are taking place.

The palaeontological impact assessment process presents an opportunity for identification, access and possibly salvage of fossils and add to the few good plant localities. Mitigation can provide valuable onsite research that can benefit both the community and the palaeontological fraternity.

A Phase 2 study is very often the last opportunity we will ever have to record the fossil heritage within the development area. Fossils excavated will be stored at a National Repository.

A Phase 2 Palaeontological Impact Assessment: Mitigation will include (SAHRA) -

1. Recommendations for the future of the site.
2. Description and purpose of work done (including number of people and their responsibilities).
3. A written assessment of the work done, fossils excavated, not removed or collected and observed.
4. Conclusion reached regarding the fossil material.
5. A detailed site plan and map.
6. Possible declaration as a heritage site or Site Management Plan.
7. Stakeholders.
8. Detailed report including the Desktop and Phase 1 study information.
9. Annual interim or progress Phase 2 permit reports as well as the final report.
10. Methodology used.

Mitigation involves planning the protection of significant fossil sites, rock units or other palaeontological resources and/or excavation, recording and sampling of fossil heritage that might be lost during development, together with pertinent geological data. The mitigation may take place before and / or during the construction phase of development. The specialist will require a Phase 2 mitigation permit from the relevant Heritage Resources Authority before a Phase 2 may be implemented.

The Mitigation is done in order to rescue representative fossil material from the study area to allow and record the nature of each locality and establish its age before it is destroyed and to make samples accessible for future research. It also interprets the evidence recovered to allow for education of the public and promotion of palaeontological heritage.

Should further fossil material be discovered during the course of the development (*e. g.* during bedrock excavations), this must be safeguarded, where feasible *in situ,* and reported to a palaeontologist or to the Heritage Resources authority. In situations where the area is considered palaeontologically sensitive (*e. g.* Karoo Supergroup Formations, ancient marine deposits in the interior or along the coast) the palaeontologist might need to monitor all newly excavated bedrock. The developer needs to give the palaeontologist sufficient time to assess and document the finds and, if necessary, to rescue a representative sample.

When a Phase 2 palaeontological impact study is recommended, permission for the development to proceed can be given only once the heritage resources authority has received and approved a Phase 2 report and is satisfied that (a) the palaeontological resources under threat have been adequately recorded and sampled, and (b) adequate development on fossil heritage, including, where necessary, *in situ* conservation of heritage of high significance. Careful planning, including early consultation with a palaeontologist and heritage management authorities, can minimise the impact of palaeontological surveys on development projects by selecting options that cause the least amount of inconvenience and delay.

Three types of permits are available; Mitigation, Destruction and Interpretation. The specialist will apply for the permit at the beginning of the process (SAHRA 2012).

The Palaeontological Society of South Africa (PSSA) does not have guidelines on excavating or collecting, but the following is suggested:

1. The developer needs to clearly stake or peg-out (survey) the areas affected by the mining/ construction/ development operations and dig representative trenches and if possible supply geological borehole data. When the route is better defined, it is recommended that a specialist undertake a ‘walk through’ of the entire road as well as construction areas, including camps and access roads, prior to the start of any construction activities, this may be done in sections.
2. When clearing vegetation, topsoil, subsoil or overburden, hard rock (outcrop) is found, the contractor needs to stop all work.
3. A Palaeobotanist / palaeontologist (contact SAHRIS for list) must then inspect the affected areas and trenches for fossiliferous outcrops / layers. The contractor / developer may be asked to move structures, and put the development on hold.
4. If the palaeontologist / palaeobotanist is satisfied that no fossils will be destroyed or have removed the fossils, development and removing of the topsoil can continue.
5. After this process the same palaeontologist / palaeobotanist will have to inspect and offer advice through the Phase 2 Mitigation Process. Bedrock excavations for footings may expose, damage or destroy previously buried fossil material and must be inspected.

6. When permission for the development is granted, the next layer can be removed, if this is part of a fossiliferous layer, then with the removal of each layer of sediment, the palaeontologist / palaeobotanist must do an investigation (a minimum of once every week).
7. At this stage the palaeontologist / palaeobotanist in consultation with the developer / mining company must ensure that a further working protocol and schedule is in place. Onsite training should take place, followed by an annual visit by the palaeontologist / palaeobotanist.

Fossil excavation if necessary during Phase 2:

1. Photography of fossil / fossil layer and surrounding strata.
2. Once a fossil has been identified as such, the task of extraction begins.
3. It usually entails the taking of a GPS reading and recording lithostratigraphic, biostratigraphic, date, collector and locality information.
4. Using Paraloid (B-72) as an adhesive and protective glue, parts of the fossil can be kept together (not necessarily applicable to plant fossils).
5. Slowly chipping away of matrix surrounding the fossil using a geological pick, brushes and chisels.
6. Once the full extent of the fossil / fossils are visible, it can be covered with a plaster jacket (not necessarily applicable to plant fossils).
7. Chipping away sides to loosen underside.
8. Splitting of the rock containing palaeobotanical material should reveal any fossils sandwiched between the layers.

The South African Heritage Resources Agency has the following documents in place:
Guidelines to Palaeontological Permitting policy.
Minimum Standards: Palaeontological Component of Heritage Impact Assessment reports.
Guidelines for Field Reports.
Palaeotechnical Reports (Eastern Cape, North West, Northern Cape, Mpumalanga, Gauteng, Western Cape, Free State, Kwazulu Natal, and Limpopo)

Appendix 2:
Table 2: Listing points in Appendix 6 of the Act and position in Report (bold in text).

Section in Report	Point in Act	Requirement
B	1(c)	Scope and purpose of report
B	1(d)	Duration, date and season
B	1(g)	Areas to be avoided
D	1(ai)	Specialist who prepared report
D	1(aii)	Expertise of the specialist
F Figure 3	1(h)	Map
F	1(ni)	Authorisation
F	1(nii)	Avoidance, management, mitigation and closure plan
G Table 1	1(cA)	Quality and age of base data
G Table 2	1(cB)	Existing and cumulative impacts
G	1(f)	Details or activities of assessment
G	1(j)	Description of findings
H	1(e)	Description of methodology
H	1(i)	Assumptions
J	1(o)	Consultation
J	1(p)	Copies of comments during consultation

J	1(q)	Information requested by authority
Declaration	1(b)	Independent declaration
Appendix 2	1(k)	Mitigation included in EMPr
Appendix 2	1(l)	Conditions included in EMPr
Appendix 2	1(m)	Monitoring included in EMPr
D	2	Protocol or minimum standard