





PALAEONTOLOGICAL DESKTOP ASSESSMENT FOR THE PROPOSED EXTENSION OF THE SOUTH AFRICAN NUCLEAR ENERGY CORPORATION (NECSA) PIPE STORAGE FACILITY, MADIBENG LOCAL MUNICIPALITY, NORTH WEST PROVINCE CaseID: 14419

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(a) + 27 (0) 12 332 5305

+27 (0) 86 675 8077

(contact@pgsheritage.co.za

PO Box 32542, Totiusdal, 0134

Head Office: 906 Bergarend Streets Waverley, Pretoria, South Africa

Offices in South Africa, Kingdom of Lesotho and Mozambique

Directors: HS Steyn, PD Birkholtz, W Fourie

Declaration of Independence

I, Elize Butler, declare that -

General declaration:

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

Disclosure of Vested Interest

I do not have and will not have any vested interest (either business, financial, personal or other) in the proposed activity proceeding other than remuneration for work performed in terms of the Regulations; PALAEONTOLOGICAL CONSULTANT: CONTACT PERSON: Banzai Environmental (Pty) Ltd Elize Butler Tel: +27 844478759

Email: elizebutler002@gmail.com

SIGNATURE:

ACKNOWLEDGEMENT OF RECEIPT

Report Title	Palaeontological Desktop Assessment for the proposed extension of		
	the South African Nuclear Energy Corporation (Necsa) pipe storage		
	facility, Madibeng Local Municipality, North West Province		
Control	Name	Signature	Designation
Author	Elize Butler	Eiler.	Palaeontologist
Reviewed	Cherene de	<u> </u>	Archaeologist/ PGS
	Bruyn	Cleveret	Heritage
Reviewed	Wouter Fourie		Principal Heritage
		100 -	Specialist
Client	Kirthi Peramaul		GA Environment
		Revaman	

CLIENT:

GA Environment (Pty) Ltd

CONTACT PERSON:

Kirthi Peramaul Tel: +27 11 312 2537 E-mail: <u>kirthip@gaenvironment.com</u>

SIGNATURE:

Revanaul

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

Table 1: NEMA Table

NEMA Regs (2014) - Appendix 6	Relevant section in report
1. (1) A specialist report prepared in terms of these Regulations must contain-	
details of- the specialist who prepared the report; and the expertise of that specialist to compile a specialist report including a curriculum vitae;	Page ii and Section 2 of Report – Contact details and company and Appendix B
a declaration that the specialist is independent in a form as may be specified by the competent authority;	Page ii
an indication of the scope of, and the purpose for which, the report was prepared;	Section 4 – Objective
(cA) an indication of the quality and age of base data used for the specialist report	Section 5 – Geological and Palaeontological history
(B) a description of existing impacts on the site, cumulative impacts of the proposed development and levels of acceptable change;	Section 9
the date, duration and season of the site investigation and the relevance of the season to the outcome of the assessment;	N/A Desktop Study
a description of the methodology adopted in preparing the report or carrying out the specialized process inclusive of equipment and modeling used;	Section 7 Approach and Methodology
details of an assessment of the specifically identified sensitivity of the site related to the proposed activity or activities and its associated structures and infrastructure, inclusive of a site plan identifying site alternatives;	Section 1 and 10
an identification of any areas to be avoided, including buffers;	Not identified, Section 9
a map superimposing the activity including the associated structures and infrastructure on the environmental sensitivities of the site including areas to be avoided, including buffers;	Section 5 – Geological and Palaeontological history
a description of any assumptions made and any uncertainties or gaps in knowledge;	Section 7.1 – Assumptions and Limitation
a description of the findings and potential implications of such findings on the impact of the proposed activity, including identified alternatives on the environment or activities;	Section 10
any mitigation measures for inclusion in the EMPr;	N/A
any conditions for inclusion in the environmental authorization;	N/A
any monitoring requirements for inclusion in the EMPr or environmental authorization;	N/A
a reasoned opinion- as to whether the proposed activity, activities or portions thereof should be authorized; (iA) regarding the acceptability of the proposed activity or activities;	
if the opinion is that the proposed activity, activities or portions thereof should be authorized, any avoidance, management and mitigation measures that should be included in the EMPr, and where	
applicable, the closure plan;	Section 10

Palaeontological Desktop Assessment of the proposed Necsa pipe storage facility, Madibeng Local Municipality, North West Province

10 November 2020

NEMA Regs (2014) - Appendix 6	Relevant section in report
a description of any consultation process that was undertaken during	Not an all and to
the course of preparing the specialist report;	Not applicable.
a summary and copies of any comments received during any	
consultation process and where applicable all responses thereto; and	Not applicable.
any other information requested by the competent authority.	Not applicable.
2) Where a government notice <i>gazetted</i> by the Minister provides for	
any protocol or minimum information requirement to be applied to a	Section 3
specialist report, the requirements as indicated in such notice will	compliance with
apply.	SAHRA guidelines

EXECUTIVE SUMMARY

Banzai Environmental was appointed by PGS Heritage (Pty) Ltd to conduct the Palaeontological Desktop Assessment (PDA) to assess the proposed extension of the pipe storage facility for SAFARI-1 spent fuel and containerised NTP Uraniferous Waste. The National Heritage Resources Act (No 25 of 1999, section 38) (NHRA), states that a Palaeontological Impact Assessment (PIA) is necessary to detect the presence of fossil material within the planned development footprint. This PDA is thus necessary to evaluate the effect of the construction on the palaeontological resources.

The proposed extension of the Nuclear Energy Corporation of South Africa (Necsa) pipe storage facility, Madibeng Local Municipality, North West Province is primary underlain by ancient Precambrian bedrocks of the Timeball Hill Formation (Pretoria Group, Transvaal Supergroup). According to the PalaeoMap of South African Heritage Resources Information System (SAHRIS) the Palaeontological Sensitivity of the Timeball Hill Formation of the Pretoria Group (Transvaal Supergroup) has a High Palaeontological Sensitivity (Almond and Pether 2008, SAHRIS website). The expansion of the storage facility is in a highly disturbed area and the development footprint is small. The Timeball Hill shale formation contains algal microfossils or stromatolites which are diagenetic in origin and is thus unlikely to have significant impacts on local palaeontological heritage. Four layout alternatives have been considered as well as a no go alternative. As these alternatives comprise of the same Geology no preferred alternative has been identified from a Palaeontological perspective. It is therefore considered that the extension of the Necsa pipe storage facility is deemed appropriate and feasible and will not lead to detrimental impacts on the palaeontological resources of the area. Thus, the construction and operation of the facility may be authorised as the whole extent of the development footprint is not considered sensitive in terms of palaeontological resources.

It is consequently recommended that no further palaeontological heritage studies, ground truthing and/or specialist mitigation are required pending the discovery of newly discovered fossils. 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 Environmental Control Officer (ECO) in charge of these developments. These discoveries ought to be protected (if possible, in situ) and the ECO 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 correct mitigation (recording and collection) can be carry out by a paleontologist.

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Appendix A: CV

TERMINOLOGY AND ABBREVIATIONS

Cultural significance

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

Development

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

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

Fossil

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

Heritage

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

Heritage resources

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

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

Palaeontology

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

Abbreviations	Description	
ASAP	Association of South African Professional Archaeologists	
CRM	Cultural Resource Management	
DEFF	Department of Environmental Department of Environment, Forestry and	
	Fisheries	
ECO	Environmental Control Officer	
EIA practitioner	Environmental Impact Assessment Practitioner	
EIA	Environmental Impact Assessment	
ESA	Early Stone Age	
GPS	Global Positioning System	
HIA	Heritage Impact Assessment	
I&AP	Interested & Affected Party	
LSA	Late Stone Age	
LIA	Late Iron Age	
MSA	Middle Stone Age	
MIA	Middle Iron Age	
NECSA	Nuclear Energy Corporation of South Africa	
NEMA	National Environmental Management Act	
NHRA	National Heritage Resources Act	
PDA	Palaeontological Desktop Assessment	
PIA	Palaeontological Impact Assessment	
PHRA	Provincial Heritage Resources Authority	
PSSA	Palaeontological Society of South Africa	
SADC	Southern African Development Community	
SAHRA	South African Heritage Resources Agency	
SAHRIS	South African Heritage Resources Information System	

1 INTRODUCTION

GA Environment was appointed by the Nuclear Energy Corporation of South Africa (Necsa) to commence with an Environmental Impact Assessment Process for the proposed extension of the facility (Figure 1-3) to house an additional 48 storage vessels for SAFARI 1 spent fuel as well as 36 storage vessels for Uranium residue using the previous storage model. To date no Palaeontological Impact Assessment (PIA) has been conducted to access the proposed development for the presence of Fossil Heritage. As the expansion of the development falls in an area of high Palaeontological Sensitivity SAHRA has commissioned a Desktop PIA. This report is a response to SAHRA's Interim comment as part of the Environmental Authorization process (Interim Comment November 07, 2019, Case ID 14419).

The following information was provided by GA Environmental:

GA Environmental. 2020. Final Scoping Report for the Proposed Extension of Necsa's Pipe Storage Facility for SAFARI-1 Spent Fuel and NTP Uraniferous Waste, Madibeng Local Municipality, North West Province.

The planned storage pipes (accumulating SAFARI-1 spent fuel) and containerized NTP Uraniferous Waste will comprise of a leak-proof stainless-steel storage vessel hanging inside a 17m deep borehole. The borehole has a fibre cement and mild steel lining. The spent fuel storage pipes and containers will be stored in an inert gas atmosphere in the storage vessel by backfilling pipes with an argon-helium mixture. Each storage pipe can hold 20 spent fuel assemblies or 32 NTP containers (GA environmental, 2020).

The facility currently is used for the temporary storage of spent nuclear fuel from the SAFARI-1 research reactor and is licensed for a storage period of up to 50 years. The storage space for the SAFARI-1 spent fuel will be exhausted by the end of 2020 involving an extension of the storage capacity. Without this additional storage capacity, SAFARI-1 and NTP will not be able to sustain normal operations, (production of medical isotopes, and research & training). Necsa supplies a wide range of advanced hitechnology services and products to South Africa and the foreign market with the SAFARI-1 reactor as the foundation of the industrial isotope production market. The National Nuclear Regulator (NNR) requires that the spent fuel elements released from the SAFARI-1 reactor and the NTP Uraniferous waste from NTP must be stored safely. And thus Necsa initiated the proposed pipe store extension (GA environmental, 2020).

During the pre-feasibility stage of the project Necsa assessed the following alternatives for the Research Reactor Spent Nuclear Fuel: 1) Return to the supplier or willing receiver; 2) Reprocessing of Fuel;3) Wet storage;4) Dry Cask Storage;5) Dry Storage Vaults, **Necsa's preferred alternative** (GA environmental, 2020).

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1.1 Thabana Pipe Storage Facility alternatives

- 1.1.1 Expand the Pipe Store Footprint (Necsa's preferred alternative).
- 1.1.2 Re-racking the current Pipe Store configuration.
- 1.1.3 Increase the depth of the current boreholes; and
- 1.1.4 Use the HCC Section for the fuel storage expansion.

Necsa (2017) is of the opinion that the proposed extension will be technical feasible without intruding on the existing Pipe Store Operations (GA environmental, 2020).

1.2 Site Layout alternatives

The site Layout is relevant to the Palaeontology of this project

- 1.2.1 Extend both SAFARI-1 and NTP pipes northward from the current facility (Layout Option 1; Figure 4);
- *1.2.2* Extend both SAFARI-1 and NTP pipes southward from the current facility (Layout Option 2; Figure 5);
- 1.2.3 Build a paralleled conjoined facility east from the current facility to house both waste types (Layout Option 3; Figure 6);
- 1.2.4 Extend the NTP waste pipes northward and the SAFARI-1 pipes southward from the current facility (Layout Option 4; Figure 7).
- 1.2.5 No-Go Option



Figure 1: Google Earth Image of the location of the proposed Nesca pipe storage facility Madibeng Local Municipality, North West Province. The proposed development is indicated by the blue arrow.



Figure 2: Close-up Google Earth Image of the proposed Nesca pipe storage facility Madibeng Local Municipality, North West Province The northern extension is indicated in green and the southern extension in red.

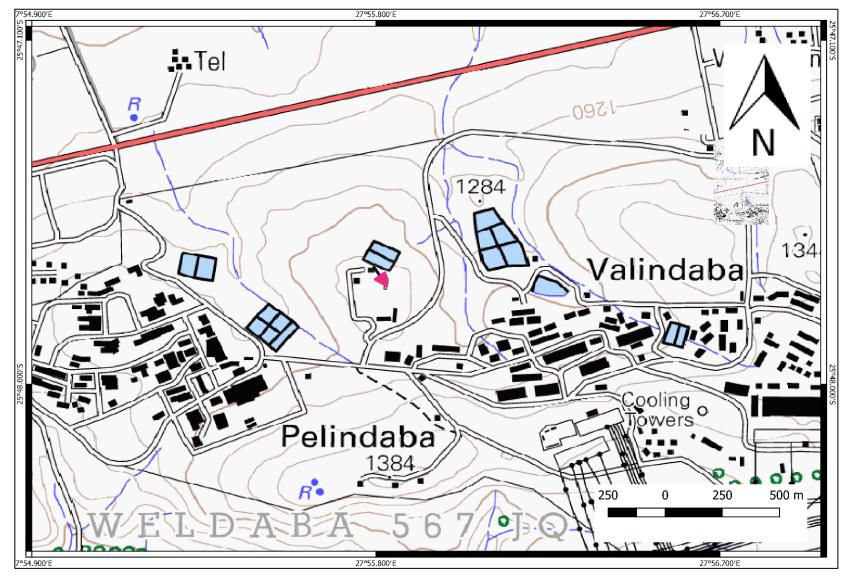


Figure 3: Extract of the 1: 50 000 topographical map (2527 DD Broederstroom) indicating the locality of the proposed Nesca pipe storage facility in the Madibeng Local Municipality, North West Province. The proposed development is indicated by the pink arrow.

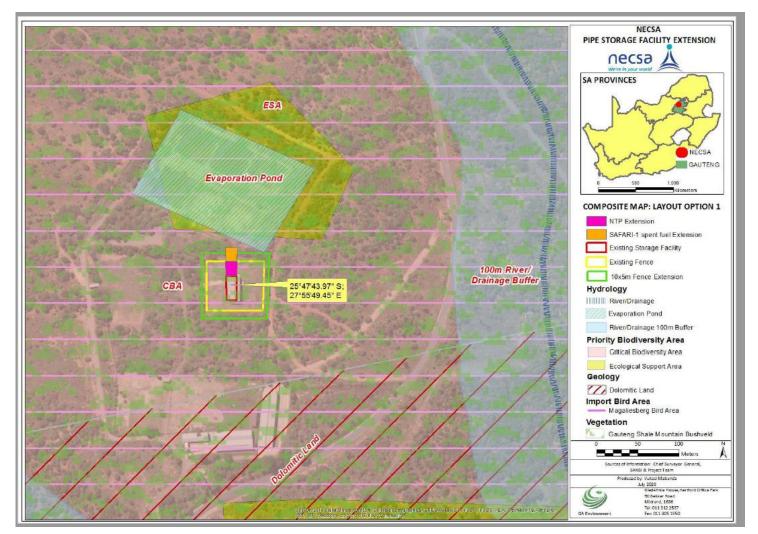


Figure 4: Layout option 1

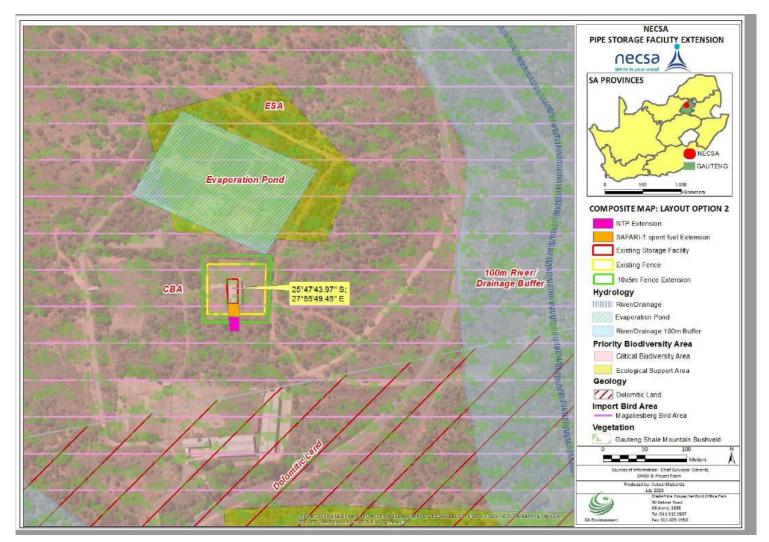


Figure 5: Layout option 2

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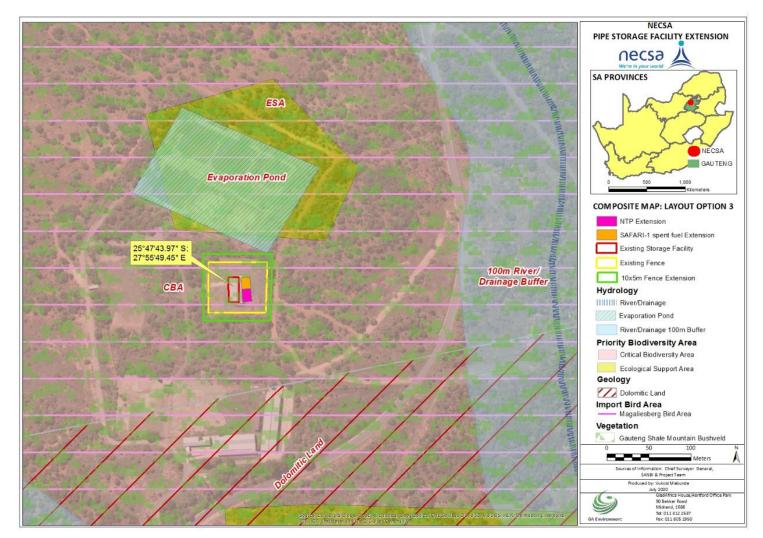


Figure 6: Layout option 3

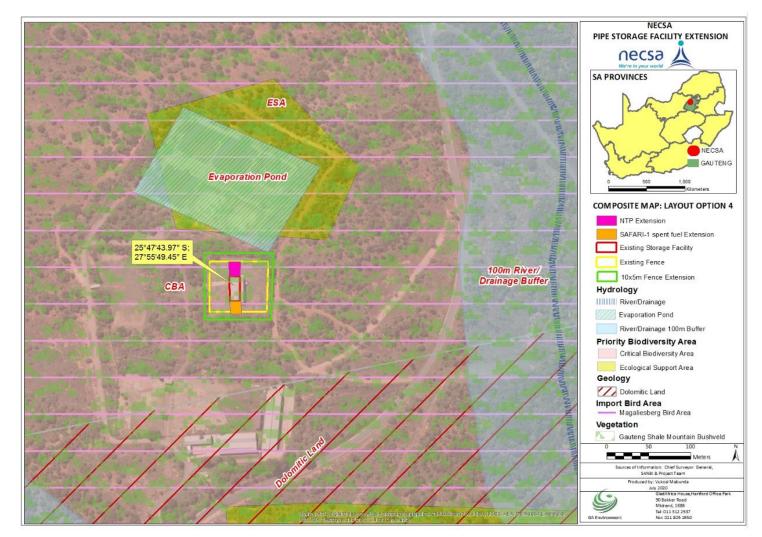


Figure 7: Layout option 4

Palaeontological Desktop Assessment of the proposed Necsa pipe storage facility, Madibeng Local Municipality, North West Province

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QUALIFICATIONS AND EXPERIENCE OF THE AUTHOR 2

The author (Elize Butler) has an MSc in Palaeontology from the University of the Free State, Bloemfontein, South Africa. She has been working in Palaeontology for more than twenty-four She has extensive experience in locating, collecting and curating fossils, including years. exploration field trips in search of new localities in the Karoo Basin. She has been a member of the Palaeontological Society of South Africa for 13 years. She has been conducting PIA's since 2014.

LEGISLATION 3

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 exceptional and non-renewable and is protected by the NHRA. Palaeontological resources and 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), an 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 300 m in length;
- the construction of a bridge or similar structure exceeding 50 m in length; .
- any development or other activity which will change the character of a site-
- (exceeding 5 000 m² in extent; or
- involving three or more existing erven or subdivisions thereof; or
- involving three or more erven or divisions thereof which have been consolidated within the past five years; or
- the costs of which will exceed a sum set in terms of regulations by SAHRA or a provincial heritage resources authority

- the re-zoning of a site exceeding 10 000 m² in extent;
- or any other category of development provided for in regulations by SAHRA or a Provincial heritage resources authority.

4 OBJECTIVE

The aim of a Palaeontological Impact Assessment (PIA) is to decrease the effect of the development on potential fossils at the development site.

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

The terms of reference of a PIA are as follows:

General Requirements:

- Adherence to the content requirements for specialist reports in accordance with Appendix
 6 of the EIA Regulations 2014, as amended.
- Adherence to all applicable best practice recommendations, appropriate legislation and authority requirements.
- Submit a comprehensive overview of all appropriate legislation, guidelines.
- Description of the proposed project and provide information regarding the developer and consultant who commissioned the study.
- Description and location of the proposed development and provide geological and topographical maps.
- Provide Palaeontological and geological history of the affected area.
- Identification sensitive areas to be avoided (providing shapefiles/kml's) in the proposed development.
- Evaluation of the significance of the planned development during the Pre-construction, Construction, Operation, Decommissioning Phases and Cumulative impacts. Potential impacts should be rated in terms of the direct, indirect and cumulative:
 - a. **Direct impacts** are impacts that are caused directly by the activity and generally occur at the same time and at the place of the activity.
 - b. **Indirect impacts** of an activity are indirect or induced changes that may occur as a result of the activity.

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- c. Cumulative impacts result from the incremental impact of the proposed activity on a common resource when added to the impacts of other past, present or reasonably foreseeable future activities.
- Fair assessment of alternatives (infrastructure alternatives have been provided):
- Recommend mitigation measures to minimise the impact of the proposed development; and

Implications of specialist findings for the proposed development (such as permits, licenses etc).

5 **GEOLOGICAL AND PALAEONTOLOGICAL HISTORY**

The proposed extension of the Necsa pipe storage facility, Madibeng Local Municipality, North West Province is shown the 1:250 000 2528 Rustenburg Geological Map (Council for Geosciences) (Figure 4-6). The proposed development is primary underlain by the Precambrian sediments of the Timeball Hill Formation (Pretoria Group, Transvaal Supergroup). According to the PalaeoMap of South African Heritage Resources Information System (SAHRIS) the Palaeontological Sensitivity of the Timeball Hill Formation of the Pretoria Group (Transvaal Supergroup) has a High Palaeontological Sensitivity (Almond and Pether 2008, SAHRIS website; Figure 7). Groenewald and Groenewald 2014 allocated a high Sensitivity to the Timeball Hill Formation. He noted that potentially fossiliferous Late Caenozoic Cave breccias within the "Transvaal dolomite" outcrop area could be present. These breccias are not individually mapped on geological maps.

The Transvaal Supergroup is preserved in three structural basins on the Kaapvaal Craton of South Africa namely the Griqualand West Basin, Transvaal Basin, as well as the Kanye Basin in Botswana. The Griqualand West Basin can be subdivided into the Ghaap Plateau and Prieska sub basins. The geometry of the three basins is mostly stratiform with the exclusion of the volcanic precursor of the Kanye Basin and parts of the Griqualand West Basin. Extensive deformation has taken place in the south-western portion of the Grigualand West Basin. Rocks of the Transvaal Supergroup in the Transvaal Basin were intruded by the Bushveld Complex approximately 2060 million years ago. The Transvaal Supergroup overlays the Archaean basement as well as the Witwatersrand and Ventersdorp Supergroups. In the far western and Kanye Basins rocks belonging to the Kanye Formation and Gaborone Granite Suite is also overlain by the Transvaal Supergroup (Eriksson, 2003 et al, 2006).

The Pretoria Group comprises primarily of mudstones, quartzitic sandstones, minor conglomerate, and shale as well as a volcanic unit. The Pretoria Group overlies the Chuniespoort Group. The Pretoria Group consists mainly of the Time Ball Hill, Silverton and Magaliesberg Formations as well as smaller Formations. The Time Ball Hill shale formation contains 'algal microfossils or

stromatolites which are diagenetic in origin. These stromatolites are preserved in the subordinate carbonate rocks in the Pretoria Group (Eriksson 1999, Kent 1980).

Symbol	Group/Formation	Lithology	Palaeontological Sensitivity
Vti	Klapperkop	Wacke, siltstone, shale, magnetic ironstone and quartzite which are ferruginous in places	High
Vt	Timeball Hill Formation, Pretoria Group, Transvaal Supergroup	Conglomerates, diamictite, quartzite, minor lavas with lacustrine and fluvio-deltaic mudrocks.	High

Table 3: Rock formations present in the development

The Timeball Hill Formation comprises of conglomerates, diamictite, quartzite, minor lavas with lacustrine and fluvio-deltaic mudrocks, while the overlying Klapperkop Member of the Timeball Hill Formation consist of conglomerate, quartzite, shale and siltstone (Groenewald 2014). Catuneanu & Eriksson (2002) is of the opinion that the Timeball Hill Formation was deposited within a deep marine basin (Figure 4).

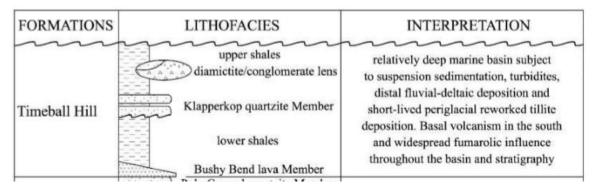


Figure 8: Stratigraphy and depositional settings if the Timeball Hill Formation at the base of the Pretoria succession (Catuneanu and Eriksson 2002).

The Timeball Hill Formation is known to contain stromatolites and are associated with thin carbonate interbeds within turbidite sequences in the lower part of the formation (Catuneanu & Eriksson 2002). Stromatolites have not been recorded from the overlying fluvio-deltaic Klapperkop Quartzite Member. Other subunits in the Pretoria Group comprising stromatolites possibly also contain organic-walled microfossils.

Stromatolites are layered mounds, columns and sheet-like sedimentary rocks. These structures were originally formed by the growth of layer upon layer of cyanobacteria, a single-celled photosynthesizing microbe. Cyanobacteria are prokaryotic cells (simplest form of modern carbon-

bases life). Stromatolites are first found in Precambrian rocks and are known as the earliest known fossils. The oxygen atmosphere that we depend on was generated by numerous cyanobacteria photosynthesizing during the Archaean and Proterozoic Era.

Stromatolites and oolites from the Transvaal Supergroup have been described by various authors (Eriksson and Altermann, 1998). Detailed descriptions of South African Archaean stromatolites are available in the literature (Altermann, 1995; Altermann 2001; Buick, 2001; and Schopf, 2006).

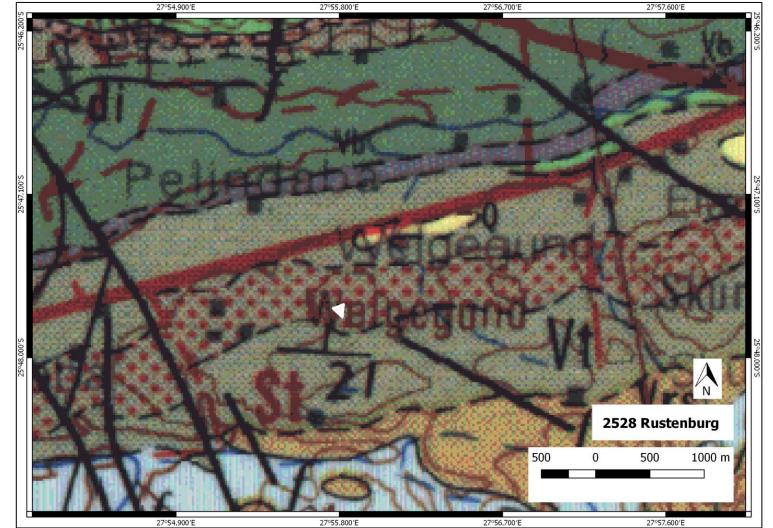
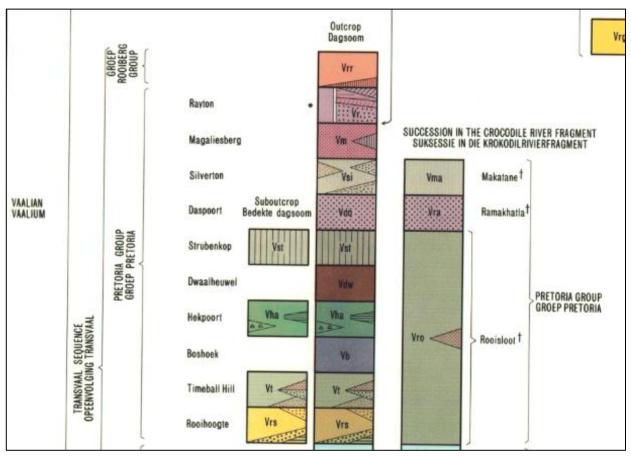


Figure 9: Surface geology of the proposed extension of the Necsa pipe storage facility, Madibeng Local Municipality, North West Province is underlain by the by sediments of the Timeball Hill Formation (Pretoria Group, Transvaal Supergroup). The proposed development is indicated in by a white triangle. Map drawn by QGIS 2.18.28.



LEGEND

Vt - Timeball Hill Formation; Pretoria Group; Transvaal Supergroup

Vb – Boshoek; Pretoria Group; Transvaal Supergroup

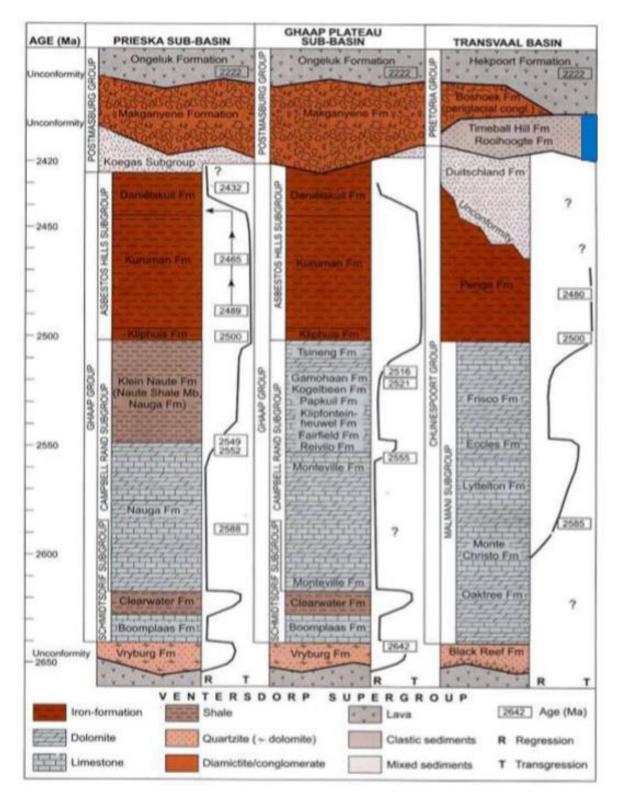


Figure 10: Stratigraphy of the Transvaal Supergroup of the Ghaap Plateau Basin. The proposed development is indicated in blue (Eriksson, et al. 2006).

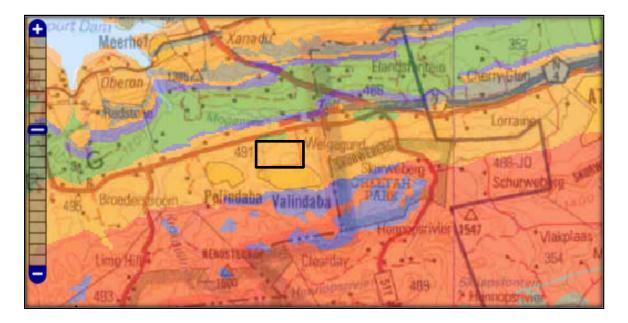


Figure 11: Extract of the 1 in 250 000 SAHRIS PalaeoMap map (Council of Geosciences). Approximate location of the proposed development is indicated in black.

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 palaeo sensitivity map (Figure 11) there is a very high chance of finding fossils in this area.

6 GEOGRAPHICAL LOCATION OF THE SITE

GPS coordinates are 25°47'44.12 S; 27°55'49.50" E

The facility is located on the Necsa site where radioactive waste has been stored since 1997. The pipe storage facility is situated on the Pelindaba site on the Farm Weldaba 567 JQ within the Madibeng Local Municipality.

7 METHODS

The aim of a desktop study is to evaluate the risk to palaeontological heritage in the proposed development. This include all trace fossils and fossils. All available information is consulted to compile a desktop study 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

When conducting a PIA several factors can affect the accuracy of the assessment. 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 not been reviewed by palaeontologists and data is generally based on aerial photographs. 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 used to provide information on the existence of fossils in an area which was not yet been documented. When similar Assemblage Zones and geological formations for Desktop studies is used it is generally **assumed** that exposed fossil heritage is present within the footprint.

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 2526 Randburg Geological map (Council of Geoscience)
- A Google Earth map with polygons of the proposed development was obtained from PGS Consultants.
- 1:50 000 Topographical Map 2527 DD Broederstroom.
- PIA near the development site consulted include Almond 201; Bamford 2013, Bamford 2015; Fourie, 2018; Pelser 2016. See references.

9 IMPACT ASSESSMENT METHODOLOGY AND HIERARCHY

PLEASE NOTE:

Four layout alternatives have been considered as well as a no go alternative. As these alternatives comprise of the same Geology no preferred alternative has been identified from a Palaeontological perspective

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

The impacts will be ranked according to the methodology described below. Where possible, mitigation measures will be provided to manage impacts. In order to ensure uniformity, a standard impact assessment methodology will be utilised so that a wide range of impacts can be compared with each other. The impact assessment methodology makes provision for the assessment of impacts against the following criteria:

- Significance;
- Spatial scale;
- Temporal scale;
- Probability; and
- Degree of certainty.

A combined quantitative and qualitative methodology was used to describe impacts for each of the assessment criteria. A summary of each of the qualitative descriptors along with the equivalent quantitative rating scale for each of the aforementioned criteria is given in **Table 4**.

RATING	SIGNIFICANCE	EXTENT SCALE	TEMPORAL SCALE	
1	VERY LOW	Proposed site	Incidental	
2	LOW	Study area	Short-term	
3	MODERATE	Local	Medium/High-term	
4	HIGH	Regional / Provincial	Long-term	
5	VERY HIGH	Global / National	Permanent	

Table 4: Quantitative rating and equivalent descriptors for the impact assessment criteria

A more detailed description of each of the assessment criteria is given in the following sections.

9.1 Significance Assessment

Significance rating (importance) of the associated impacts embraces the notion of extent and magnitude but does not always clearly define these since their importance in the rating scale is very relative. For example, the magnitude (i.e. the size) of area affected by atmospheric pollution may be extremely large (1 000 km2) but the significance of this effect is dependent on the concentration or level of pollution. If the concentration is great, the significance of the impact would be HIGH or VERY HIGH, but if it is diluted it would be VERY LOW or LOW. Similarly, if 60 ha of a grassland type are destroyed the impact would be VERY HIGH if only 100 ha of that grassland type

were known. The impact would be VERY LOW if the grassland type was common. A more detailed description of the impact significance rating scale is given in **Table 5** below.

	RATING	DESCRIPTION			
5	Very high	Of the highest order possible within the bounds of impacts which could occur. In the case of adverse impacts: there is no possible mitigation and/or remedial activity which could offset the impact. In the case of beneficial impacts, there is no real alternative to achieving this benefit.			
4	High	Impact is of substantial order within the bounds of impacts, which could occur. In the case of adverse impacts: mitigation and/or remedial activity is feasible but difficult, expensive, time-consuming or some combination of these. In the case of beneficial impacts, other means of achieving this benefit are feasible but they are more difficult, expensive, time-consuming or some combination of these.			
3	Moderate	Impact is real but not substantial in relation to other impacts, which might take effect within the bounds of those which could occur. In the case of adverse impacts: mitigation and/or remedial activity are both feasible and fairly easily possible. In the case of beneficial impacts: other means of achieving this benefit are about equal in time, cost, effort, etc.			
2	Low	Impact is of a low order and therefore likely to have little real effect. In the case of adverse impacts: mitigation and/or remedial activity is either easily achieved or little will be required, or both. In the case of beneficial impacts, alternative means for achieving this benefit are likely to be easier, cheaper, more effective, less time consuming, or some combination of these.			
1	Very low	Impact is negligible within the bounds of impacts which could occur. In the case of adverse impacts, almost no mitigation and/or remedial activity are needed, and any minor steps which might be needed are easy, cheap, and simple. In the case of beneficial impacts, alternative means are almost all likely to be better, in one or a number of ways, than this means of achieving the benefit. Three additional categories must also be used where relevant. They are in addition to the category represented on the scale, and if used, will replace the scale.			
0	No impact	There is no impact at all - not even a very low impact on a party or system.			

Table 5: Description of the significance rating scale

9.2 Spatial Scale

The spatial scale refers to the extent of the impact i.e. will the impact be felt at the local, regional, or global scale. The spatial assessment scale is described in more detail in **Table 6**.

RATING		DESCRIPTION		
5	Global/National	The maximum extent of any impact.		
4	Regional/Provincial	The spatial scale is moderate within the bounds of impacts possible and will be felt at a regional scale (District Municipality to Provincial Level).		
3	Local	The impact will affect an area up to 10 km from the proposed site.		
2	Study Site	The impact will affect an area not exceeding the Eskom property.		
1	Proposed site	The impact will affect an area no bigger than the ash disposal site.		

 Table 6: Description of the significance rating scale

9.3 Duration Scale

In order to accurately describe the impact, it is necessary to understand the duration and persistence of an impact in the environment. The temporal scale is rated according to criteria set out in **Table 7**.

RATING		DESCRIPTION			
1	Incidental	The impact will be limited to isolated incidences that are expected to occur very sporadically.			
2	Short-term	The environmental impact identified will operate for the duration of the construction phase or a period of less than 5 years, whichever is the greater.			
3	Medium/High term	The environmental impact identified will operate for the duration of life of facility.			
4	Long term	The environmental impact identified will operate beyond the life of operation.			
5	Permanent	The environmental impact will be permanent.			

Table 7: Description of the temporal rating scale

9.4 Degree of Probability

Probability or likelihood of an impact occurring will be described as shown in **Table 8** below.

RATING	DESCRIPTION		
1	Practically impossible		
2	Unlikely		
3	Could happen		
4	Very Likely		
5	It's going to happen / has occurred		

Table 8: Description of the degree of probability of an impact occurring

9.5 Degree of Certainty

As with all studies it is not possible to be 100% certain of all facts, and for this reason a standard "degree of certainty" scale is used as discussed in **Table 9**. The level of detail for specialist studies is determined according to the degree of certainty required for decision-making. The impacts are discussed in terms of affected parties or environmental components.

Table 9: Description of the degree of certainty rating scale

RATING	DESCRIPTION			
Definite	More than 90% sure of a particular fact.			
Probable	Between 70 and 90% sure of a particular fact, or of the likelihood of that impact occurring.			
Possible	Between 40 and 70% sure of a particular fact or of the likelihood of an impact occurring.			
Unsure	Less than 40% sure of a particular fact or the likelihood of an impact occurring.			
Can't know	The consultant believes an assessment is not possible even with additional research.			
Don't know	The consultant cannot, or is unwilling, to make an assessment given available information.			

9.6 Quantitative Description of Impacts

To allow for impacts to be described in a quantitative manner in addition to the qualitative description given above, a rating scale of between 1 and 5 was used for each of the assessment criteria. Thus, the total value of the impact is described as the function of significance, spatial and temporal scale as described below:

Impact Risk = (SIGNIFICANCE +	Spatial + Temporal) X Probability
3	5

An example of how this rating scale is applied is shown in **Table 10**.

Impact	npact Significance		Spatial Temporal Scale Scale		Rating
	LOW	Local	Medium/High- term	Could Happen	
Impact	2	3	3	3	1.6

Table 10: Example of Rating Scale

Note: The significance, spatial and temporal scales are added to give a total of 8, that is divided by 3 to give a criteria rating of 2,67. The probability (3) is divided by 5 to give a probability rating of 0,6. The criteria rating of 2,67 is then multiplied by the probability rating (0,6) to give the final rating of 1,6.

The impact risk is classified according to five classes as described in the Table 11 below.

RATING	IMPACT CLASS	DESCRIPTION
0.1 – 1.0	1	Very Low
1.1 – 2.0	2	Low
2.1 – 3.0	3	Moderate
3.1 – 4.0	4	High

Table 11: Impact Risk Classes

4.1 - 5.0	5	Very High
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Therefore, with reference to the example above, an impact rating of 1.6 will fall in the Impact Class 2, which will be considered to be a low impact.

9.7 Impact Assessment Table

Table 12: Impact ratings for the Necsa site

IMPACT	IMPACT DIRECTIO N	SIGNIFICANC E	SPATIAL SCALE	TEMPORAL SCALE	PROBAB ILITY	RATING
	Negative	LOW	Isolated Sites / proposed site	Permanent	Could happen	
Impact on Paleontolo gical resources Alternatives 1-4	-	2	1	5	3	1,60
No-go Alternative	No impact	No impact	No impact	No impact	No impact	

9.8 Summary of Impact Tables

The proposed development is primary underlain by the Precambrian sediments of the Timeball Hill Formation (Pretoria Group, Transvaal Supergroup). According to the PalaeoMap on SAHRIS the Palaeontological Sensitivity of the Timeball Hill Formation of the Pretoria Group (Transvaal Supergroup) has a High Palaeontological Sensitivity. Only the site will be affected by the proposed development. The expected duration of the impact is assessed as potentially permanent to long term. The impact is highly destructive, although the possibility of the impact occurring is probable. The significance of the impact occurring will be LOW. As fossil heritage will be destroyed the impact is irreversible but the degree to which the impact can cause irreplaceable loss of resources is low. The cumulative impact will be low because the area is diagenetic in origin and thus the impacts on fossil heritage in the area will be low.

10 FINDINGS AND RECOMMENDATIONS

The proposed extension of the Nuclear Energy Corporation of South Africa (Necsa) pipe storage facility, Madibeng Local Municipality, North West Province is primary underlain by ancient Precambrian bedrocks of the Timeball Hill Formation (Pretoria Group, Transvaal Supergroup).

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According to the PalaeoMap of South African Heritage Resources Information System (SAHRIS) the Palaeontological Sensitivity of the Timeball Hill Formation of the Pretoria Group (Transvaal Supergroup) has a High Palaeontological Sensitivity (Almond and Pether 2008, SAHRIS website). The expansion of the storage facility is in a highly disturbed area and the development footprint is small. The Timeball Hill shale formation contains 'algal microfossils or stromatolites which are diagenetic in origin and is thus unlikely to have significant impacts on local palaeontological heritage. Four layout alternatives have been considered as well as a no go alternative. As these alternatives comprise of the same Geology no preferred alternative has been identified from a Palaeontological perspective. It is therefore considered that the extension of the Necsa pipe storage facility is deemed appropriate and feasible and will not lead to detrimental impacts on the palaeontological resources of the area. Thus, the construction and operation of the facility may be authorised as the whole extent of the development footprint is not considered sensitive in terms of palaeontological resources.

It is consequently recommended that no further palaeontological heritage studies, ground truthing and/or specialist mitigation are required pending the discovery of newly discovered fossils. 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 Environmental Control Officer (ECO) in charge of these developments. These discoveries ought to be protected (if possible, *in situ*) and the ECO 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: <u>www.sahra.org.za</u>) so that correct mitigation (recording and collection) can be carry out by a paleontologist.

11 CHANCE FINDS PROTOCOL

A following procedure will only be followed if fossils are uncovered during excavation.

11.1 Legislation

Cultural Heritage in South Africa (includes all heritage resources) is protected by the **National Heritage Resources Act (Act 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.

11.2 Background

A fossil is the naturally preserved remains (or traces) of plants or animals embedded in rock. These plants and animals lived in the geologic past 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.

11.3 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.

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.

11.4 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 coordinates.

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• 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.
- In the event that the fossil cannot be stabilized the fossil may be collected with extreme care by the ESO (site manager). 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 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

Registered as a PhD fellow at the Zoology Department of the UFS, 2013 to current Dissertation title: A new gorgonopsian from the uppermost Daptocephalus Assemblage Zone, in the Karoo Basin of South Africa

MEMBERSHIP	
Palaeontological Society of South Africa (PSSA)	2006-currently
EMPLOYMENT HISTORY	
Part-time Laboratory assistant	Department of Zoology & Entomology
	University of the Free State Zoology
	1989-1992
Part-time laboratory assistant	Department of Virology
	University of the Free State Zoology
	1992

Research Assistant

National Museum, Bloemfontein 1993 -1997

Principal Research Assistant and Collection Manager

National Museum, Bloemfontein 1998-currently

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