BANZAI ENVIRONMENTAL

PALAEONTOLOGICAL DESKTOP ASSESSMENT

SECTION 102/PART 2 AMENDMENT APPLICATION COMBINED WITH WASTE LICENSE APPLICATION TO AMEND THE EXISTING PROSPECTING RIGHT TO INCLUDE THE PROSPECTING OF ALUMINIUM-, ZINC-, SILICON- AND COPPER ORE, REGISTRATION DIVISION: KURUMAN, NORTHERN CAPE PROVINCE

DMRE ref: NC30/5/1/1/2/11873PR

August 2023

COMPILED FOR MILNEX CC

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: Banzai Environmental (Pty) Ltd

CONTACT PERSON: Elize Butler

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SIGNATURE: 

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

***Table 1**: NEMA Table*	
Requirements of Appendix 6 – GN R326 EIA Regulations of 7 April 2017	**Relevant section in report**
1.(1) (a) (i) Details of the specialist who prepared the report	Page ii and Section 2 of Report – Contact details and company and Appendix A
(ii) The expertise of that person to compile a specialist report including a curriculum vitae	Section 2 – refer to **Appendix A**
(b) A declaration that the person is independent in a form as may be specified by the competent authority	Page ii of the report
(c) An indication of the scope of, and the purpose for which, the report was prepared	Section 4 – Methods and TOR
(cA) An indication of the quality and age of base data used for the specialist report	Section 5 – Geological and Palaeontological history
(cB) a description of existing impacts on the site, cumulative impacts of the proposed development and levels of acceptable change;	Section 9
(d) The duration, date and season of the site investigation and the relevance of the season to the outcome of the assessment	Section 1, 8
(e) a description of the methodology adopted in preparing the report or carrying out the specialised process inclusive of equipment and modelling used	Section 4 Approach and Methodology
(f) details of an assessment of the specific identified sensitivity of the site related to the proposed activity or activities and its associated structures and infrastructure, inclusive of a site plan identifying site alternative;	Section 1 and 8
(g) An identification of any areas to be avoided, including buffers	Section 5 No buffers or areas of sensitivity identified
(h) A map superimposing the activity including the associated structures and infrastructure on the environmental sensitivities of the site including areas to be avoided, including buffers;	Section 5 – Geological and Palaeontological history

***Table 1**: NEMA Table*	
Requirements of Appendix 6 – GN R326 EIA Regulations of 7 April 2017	**Relevant section in report**
(i) A description of any assumptions made and any uncertainties or gaps in knowledge;	Section 4.1 – Assumptions and Limitation
(j) A description of the findings and potential implications of such findings on the impact of the proposed activity, including identified alternatives, on the environment	Section 1 and 8
(k) Any mitigation measures for inclusion in the EMPr	Section 1 and 8
(l) Any conditions for inclusion in the environmental authorisation	Section 1 and 8
(m) Any monitoring requirements for inclusion in the EMPr or environmental authorisation	Section 1 and 8
(n)(i) A reasoned opinion as to whether the proposed activity, activities or portions thereof should be authorised and	Section 1 and 8
(n)(iA) A reasoned opinion regarding the acceptability of the proposed activity or activities; and	
(n)(ii) If the opinion is that the proposed activity, activities or portions thereof should be authorised, any avoidance, management and mitigation measures that should be included in the EMPr, and where applicable, the closure plan	Section 1 and 8
(o) A description of any consultation process that was undertaken during the course of carrying out the study	N/A
(p) A summary and copies if any comments that were received during any consultation process	N/A
(q) Any other information requested by the competent authority.	N/A
(2) Where a government notice by the Minister provides for any protocol or minimum information requirement to be applied to a specialist report, the requirements as indicated in such notice will apply.	Section 3 compliance with SAHRA guidelines

EXECUTIVE SUMMARY

Banzai Environmental was appointed by Milnex CC to conduct the Palaeontological Desktop Assessment (PDA) to assess the proposed prospecting right combined with waste license to prospect for Diamonds Kimberlite (DK), Gemstones except Diamonds (GS), Diamonds Alluvial (DA), Diamonds General (D), Diamonds (DIA), Gold Ore (Au), Aluminium ore (Al), Zinc ore (Zn), Silicon ore (Si) and Copper ore (Cu) on portion 1 (Kadgame number 3), portion 2 (Noordpool) and portion 4 (Bakenskop) of the farm Kadgame 558 located within the Kuruman Magisterial District, Northern Cape Province. In accordance with the National Environmental Management Act 107 of 1998 (NEMA) and to comply with the National Heritage Resources Act (No 25 of 1999, section 38) (NHRA), this PDA is necessary to confirm if fossil material could potentially be present in the planned development area, to evaluate the potential impact of the proposed development on the Palaeontological Heritage.

The study area is largely underlain by the Cambell Rand Subgroup of the Ghaap Group (Transvaal Supergroup), with a small portion in the east underlain by red to flesh coloured wind-blown sand. Updated geology produced by the Council of Geosciences (Pretoria) refined the geological map and indicates that the study area is underlain by the Kalahari Group as well as the different Formations of the Cambel Rand Group that includes the Reivilo, Fairfield, Klippan and Wolhaarkop Formations. According to the PalaeoMap on the South African Heritage Resources Information System (SAHRIS) database, the Palaeontological Sensitivity of the Ghaap Group is Very High while that of the Kalahari Group is Moderate (Almond and Pether, 2009; Almond *et al*., 2013). The suggested location is classified as having a Very High Palaeontology Theme Sensitivity in the DEA Screening Report.

A Very High Palaeontological Significance is this allocated to this project. It is thus recommended that an EIA level palaeontology report should be conducted to assess the value and prominence of fossils in the development area and the effect of the proposed development on the palaeontological heritage. The purpose of the EIA Report is to elaborate on the issues and potential impacts identified during the scoping phase. A Phase 1 field-based assessment would be conducted with research in the site-specific study area as well as a comprehensive assessment of the impacts identified during the scoping phase.

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Appendix A:

Curriculum Vitae

GLOSSARY OF TERMS

Fossil

Mineralized bones of vertebrate and invertebrate animals, as well as plants. A trace fossil is the traces of animals/plants preserved in stone.

Heritage

That which is inherited and forms part of the National Estate (historical places, objects, fossils as defined by the National Heritage Resources Act No 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 comprises of fossilised remains or traces of past life.

LIST OF ABBREVIATIONS

BA	Basic Assessment
DEA	Department of Environmental Affairs
DFFE	Department of Forestry, Fisheries and the Environment
DMRE	Department of Mineral Resources and Energy
CA	National Competent Authority
ECO	Environmental Control Officer
EMPr	Environmental Management Programme
ESO	Environmental Site Officer
HIA	Heritage Impact Assessment
Ma	Millions of years ago
NEMA	National Environmental Management Act
NHRA	National Heritage Resources Act
PIA	Palaeontological Impact Assessment
PR	Prospecting Right
PSSA	Palaeontological Society of South Africa
SAHRA	South African Heritage Resources Agency
SAHRIS	South African Heritage Resources Information System
S&EIA	Scoping & Environmental Impact Assessment
ToR	Terms of Reference

1 INTRODUCTION

Milnex CC was contracted by Elite International Logistics (Pty) Ltd as the independent environmental consultant to undertake the Scoping and EIA process for the section 102/part 2 amendment application to the existing Environmental Authorisation under the DMRE Ref: NC 30/5/1/1/3/2/11873 PR to include the prospecting of the Aluminium ore (Al), Zinc ore (Zn), Silicon ore (Si) and Copper ore (Cu). DMRE Ref: NC-00130-PR/102 situated within the ZF Mgcawu Magisterial District, Northern Cape Province. Banzai Environment was in turn appointed to conduct the Palaeontological Desktop Assessment for this project.

Elite International Logistics (Pty) Ltd is the holder of a prospecting right under reference number NC30/5/1/1/2/11873PR to prospect for Diamonds Kimberlite, Gemstone except Diamonds, Diamonds Alluvial, Diamonds General, Diamonds and Gold Ore.

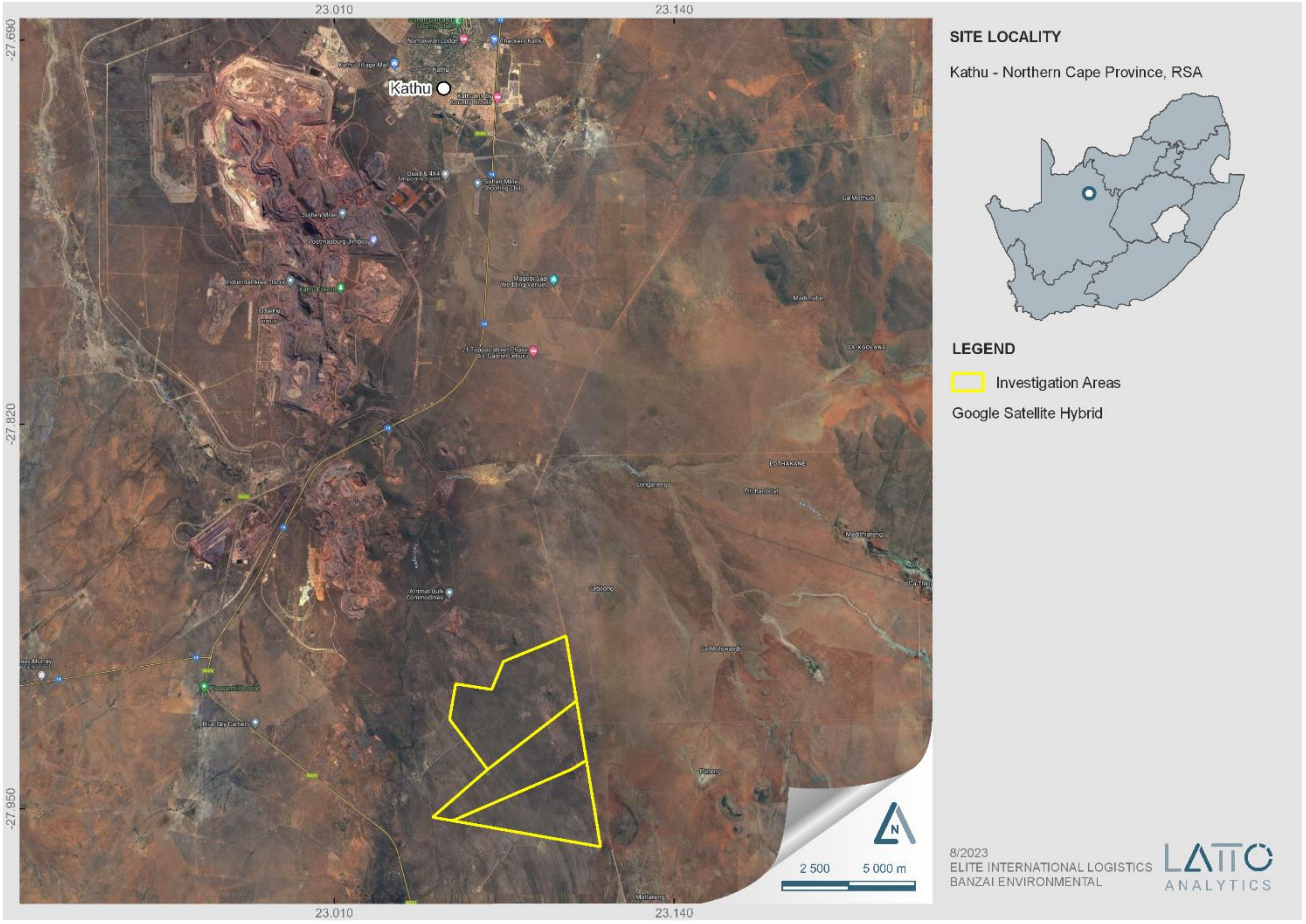


***Figure 1**: Google Earth image (2023) of the Prospecting Right Application near Kathu in the Northern Cape Province.*

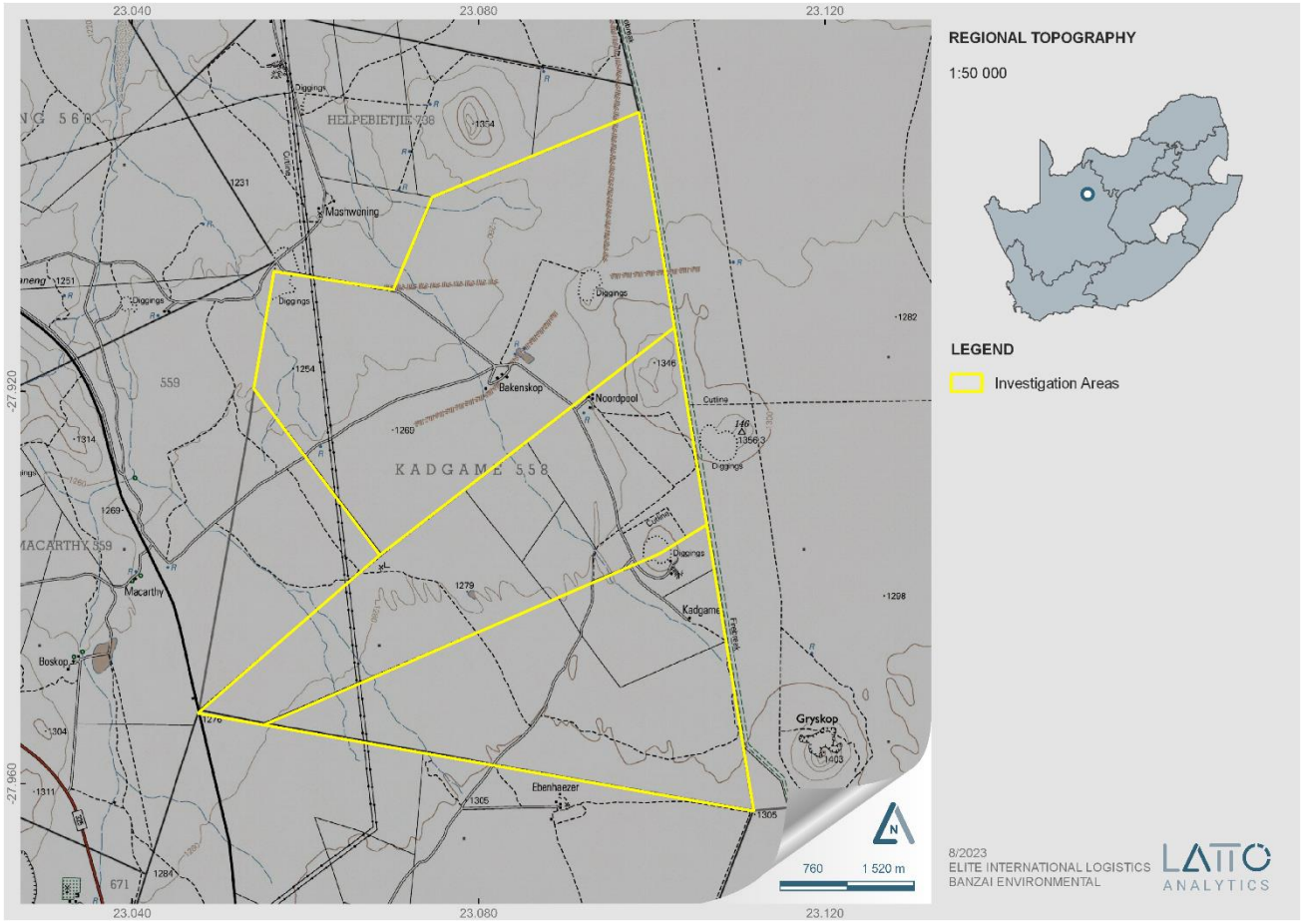


Figure 2: *Locality map of the proposed study area*

Table 2:Property description

Reason for amendment	**Elite International Logistics (Pty) Ltd** has received an environmental authorization to prospect for Diamonds Kimberlite, Gemstone except Diamonds, Diamonds Alluvial, Diamonds General, Diamonds, and Gold Ore on Portion 1 (Kadgame Number 3), Portion 2 (Noordpool) and Portion 4 (Bakenskop) of the farm Kadgame 558, Registration Division: Kuruman, Northern Cape province. **DMRE ref: NC30/5/1/1/2/11873PR** This application is to amend the existing environmental authorization to include the prospecting of Aluminium ore (Al), Zinc Ore (Zn), Silicon ore (Si) and Copper ore (Cu). **DMRE ref: NC-00130-PR/102**
Farm name	Portion 1 (Kadgame Number 3) of the farm Kadgame no 558 Registration Division: District of Kuruman, Northern Cape Province Extent: ±846.8589 Title Deed: T147/1976 Portion 2 (Noordpool) of the farm Kadgame no 558 Registration Division: District of Kuruman, Northern Cape Extent: 846.8589 Title Deed: T601/1986 Portion 4 (Bakenskop) of the farm Kadgame 558 Registration Division: District of Kuruman, Northern Cape Extent: 846.8589 Title Deed: T3542/2003
Application area (Ha)	± 2995 hectares
Magisterial district:	ZF Mgcawu District Municipality Tsantsabane Local Municipality
Registration division	Kuruman
Distance and direction from nearest town	The property is located within the Northern Cape Province, approximately 23 km South of Kathu and approximately 47km North of Postmasburg.
Types of Minerals	Approved Minerals: Diamonds Kimberlite (DK), Gemstones except Diamonds (GS), Diamonds Alluvial (DA), Diamonds General (D), Diamonds (DIA), Gold Ore (Au) **Minerals to be included:** **Aluminum ore (Al), Zinc ore (Zn), Silicon ore (Si), Copper ore (Cu)**

Information provided by Milnex cc

Economic activity in modern-day South Africa has been centered on mining activities, their ancillary services and supplies. The country's stock exchange in Johannesburg was established in 1887, a decade after the first diamonds were discovered on the banks of the Orange River, and almost simultaneously with the gold rush on the world-famous Witwatersrand.

In many ways, South Africa's political, social and economic landscape has been dominated by mining, given that, for so many years, the sector has been the mainstay of the South African economy. Although gold, diamonds, platinum and coal are the most well-known among the minerals and metals mined, South Africa also hosts chrome, vanadium, titanium and a number of other lesser minerals.

In 2018 the mining sector contributed R351 billion to the South African gross domestic product (GDP). A total of 456,438 people were employed in the mining sector in 2018. Each person employed in the mining sector has up to nine indirect dependents. The mining sector has, for many years, attracted valuable foreign direct investment to South Africa. (Mineral Council, 2021).

Diamonds, arguably the ultimate luxury mineral, comprise an intricate lattice of carbon atoms, a crystalline structure that makes them harder than any other form in nature. This characteristic makes diamonds not only popular in jewelry, but also desirable in high-tech cutting, grinding and polishing tools (Chamber of Mines, South Africa, 12:2016).

According to the Chamber of Mines the country's diamond sector is far from reaching the end of its life even though diamond mining has been taking place in South Africa for almost a century and a half. The primary sources of all of South Africa's diamonds are kimberlites in ancient, vertically dipping volcanic pipes most of which were located in the vicinity of the city of Kimberley and which were initially amenable to open-cast.

Economic growth - South Africa's total reserves remain some of the world's most valuable, with an estimated worth of R20.3-trillion. Overall, the country is estimated to have the world's fifth-largest mining sector in terms of GDP value. With South Africa's economy built on gold and diamond mining, the sector is an important foreign exchange earner, with gold accounting for more than one-third of exports. In 2009, the country's diamond industry was the fourth largest in the world.

Mining is a cornerstone of the economy, making a significant contribution to economic activity, job creation and foreign exchange earnings. Mining and its related industries are critical to South Africa's socio-economic development.

2 QUALIFICATIONS AND EXPERIENCE OF THE AUTHOR

Mrs. Elize Butler conducted the current study. For developments in the Free State, KwaZulu-Natal, Eastern, Central, and Northern Cape, Northwest, Gauteng, Limpopo, and Mpumalanga, she has completed almost 300 palaeontological impact assessments. She has an MSc (*cum laude*) in Zoology with a focus in Palaeontology from the University of the Free State in South Africa, and she has more than 30 years of experience in the field. She has knowledge of finding, collecting, and curating fossils. She began conducting PIAs in 2014 and has been a member of the Palaeontological Society of South Africa (PSSA) since 2006.

3 LEGISLATION

3.1 National Heritage Resources Act (25 of 1999)

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

The identification, evaluation and assessment of any cultural heritage site, artefact or finds in the South African context is required and governed by the following legislation:

- National Environmental Management Act (NEMA) Act No. 107 of 1998
- National Heritage Resources Act (NHRA) Act No. 25 of 1999
- Minerals and Petroleum Resources Development Act (MPRDA) Act No. 28 of 2002
- Notice 648 of the Government Gazette 45421- general requirements for undertaking an initial site sensitivity verification where no specific assessment protocol has been identified.

The next section in each Act is directly applicable to the identification, assessment, and evaluation of cultural heritage resources.

GNR 982 (Government Gazette 38282, 14 December 2014) promulgated under the National Environmental Management Act (NEMA) Act No. 107 of 1998

- Basic Assessment Report (BAR) – Regulations 19 and 23
- Environmental Impacts Assessment (EIA) – Regulation 23
- Environmental Scoping Report (ESR) – Regulation 21
- Environmental Management Programme (EMPr) – Regulations 19 and 23

National Heritage Resources Act (NHRA) Act No. 25 of 1999

- Protection of Heritage Resources – Sections 34 to 36
- Heritage Resources Management – Section 38

The NEMA (No. 107 of 1998) states that an integrated EMP should (23:2 (b)) "*…identify, predict and evaluate the actual and potential impact on the environment, socio-economic conditions and cultural heritage*".

In agreement with legislative requirements, EIA rating standards as well as SAHRA policies a comprehensive and legally compatible PIA report has been compiled.

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 m^2 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 or
    - 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 METHODS AND TERMS OF REFERENCE

This PIA assesses the development's potential impact on the fossil heritage. This Palaeontological Assessment is part of the HIA Report. The PIA's goals are to: 1) identify the palaeontological significance of the rock formations in the footprint; 2) evaluate the palaeontological magnitude of the formations; 3) clarify the impact on fossil heritage; and 4) make recommendations for how the developer might protect and minimize potential harm to fossil heritage, according to the "SAHRA APM Guidelines: Minimum Standards for the Archaeological and Palaeontological Components of Impact Assessment Reports".

Calculations of the palaeontological state of each rock segment and the potential impact of development on fossil history take into account the palaeontological status of the rocks, the type of development, and the amount of bedrock removed.

The Provisional DFFE Screening Tool, the SAHRIS Palaeosensitivity map, all Palaeontological Impact Assessment reports for the same area, Google Earth images, topographical and geological maps, as well as academic articles about specimens from the development area and Assemblage Zones, are all used to create scoping reports.

When the development footprint has a moderate to high palaeontological sensitivity, a field-based assessment is necessary. A desktop or field assessment of the exposed rock is used to evaluate the significance of the proposed development's impact, and recommendations for more research or mitigation are made. Excavations for the project often only take place during the building phase, changing the terrain and destroying or permanently encasing fossils at or below the ground surface. Then, access to Fossil Heritage will no longer be available for academic study.

When doing a site investigation, a palaeontologist examines the local development as well as the quantity and variety of fossils found there. This can be demonstrated by looking at representative fossiliferous rock exposures (most igneous and metamorphic rocks are not fossiliferous, whereas sedimentary rocks contain fossil heritage). Examined rock exposures frequently contain a sizeable portion of the stratigraphic unit, which is primarily made up of recently exposed (unweathered) rock. These exposures may be man-made (such as quarries, open building excavations, even railway and road cuttings) or natural (such as cliffs, and dongas as well as rocky outcrops along stream or river banks). It is usual practice for palaeontologists to record well-preserved fossils (GPS, and stratigraphic data) during field assessment examinations.

Although mitigation is often done prior to construction, it may take place if potentially fossiliferous bedrock is revealed. Fossil collection and documentation are examples of mitigation. A permit from SAHRA must be obtained before beginning any fossil excavation, and the material must be stored at an authorized facility. When mitigation is properly used, it is possible to have a positive impact by raising awareness of the palaeontological past of the area.

By physically evaluating bedrock outcrops to determine their lithology and fossil richness and crisscrossing the development footprint, one can assess an area's fossil potential. Because the presence of fossils at the surface is so unexpected, an average sample size of the region is investigated. To be clear, however, the lack of fossils in a development footprint does not automatically suggest that there is no palaeontologically important material present on the site (on or below the ground surface).

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;
- Describe of the proposed project and provide information regarding the developer and consultant who commissioned the study;
- Describe location of the proposed development and provide geological and topographical maps

- Provide palaeontological and geological history of the affected area;
- Identify sensitive areas to be avoided (providing shapefiles/kmls) in the proposed development;
- Evaluate the significance of the planned development during the Pre-construction, Construction, Operation, Decommissioning Phases and Cumulative impacts. Potential impacts should be rated in terms of the direct, indirect and cumulative:
    a. Direct impacts are impacts that are caused directly by the activity and generally occur at the same time and at the place of the activity.
    b. Indirect impacts of an activity are indirect or induced changes that may occur as a result of the activity.
    c. Cumulative impacts are impacts that result from the incremental impact of the proposed activity on a common resource when added to the impacts of other past, present or reasonably foreseeable future activities.
- Fair assessment of alternatives (infrastructure alternatives have been provided);
- Recommend mitigation measures to minimise the impact of the proposed development; and
- Detail the implications of specialist findings for the proposed development (such as permits, licenses etc).

4.1 Assumptions and Limitations

The geology of the area is the focal point of geological maps, and the sheet explanations of the Geological Maps were not intended to focus on palaeontological heritage. Many inaccessible areas of South Africa have never been examined by palaeontologists, and data is typically dependent solely on aerial pictures. Locality and geological information in museums and university databases is out of date, and data acquired in the past is not always adequately documented.

Comparable Assemblage Zones in other places are also used to provide information on the existence of fossils in areas that have not before been recorded. When similar Assemblage Zones and geological formations are used for Desktop studies, it is commonly assumed that exposed fossil exists within the footprint. As a result, a field assessment will improve the accuracy of the desktop evaluation.

5 GEOLOGICAL AND PALAEONTOLOGICAL HISTORY

The proposed study area near Kuruman is depicted on the 1: 250 000 Kuruman 2722 (1979) Geological Map (Council of Geosciences, Pretoria) (Figure 3; Table 3). The study area is largely underlain by the Cambell Rand Subgroup (Vgd) of the Ghaap Group (Transvaal Supergroup), with a small portion in the east underlain by red to flesh coloured wind-blown sand (Qs). The Cambell Rand Subgroup is undifferentiated on this map. Updated geology produced by the Council of Geosciences (Pretoria) refined the 1979 geological map and indicates the

Kalahari Group as well as the different Formations of the Cambel Rand Group that includes the Reivilo, Fairfield, Klippan and Wolhaarkop Formations (Figure 4-6). According to the PalaeoMap on the South African Heritage Resources Information System (SAHRIS) database, the Palaeontological Sensitivity of the Ghaap Group is Very High while that of the Kalahari Group is Moderate (Figure 7; Table 6; Almond and Pether, 2009; Almond *et al*., 2013). The suggested location is classified as having a Very High Palaeontology Theme Sensitivity in the DEA Screening Report, as seen in Figure 8.

In the past the shallow marine carbonates of the Campbell Rand Subgroup (Ghaap Group) were included in the Ghaapplato Formation. It is about 2.6 to 2.5 Ga (billion years old) and was deposited on the shallow submerged shelf of the Kaapvaal Craton. This carbonate platform is very thick (approximately 1.6 -2.5 km) and comprise of cherts with minor tuffs and siliciclastic rocks as well as dolostones and dolomitic limestones.

Frequent changes in sea level were caused by changing depositional cycles in shallow water facies. Stromatolitic limestones and dolostones, oolites, laminated calcilutites, cherts, with subordinate siliclastics (shales, siltstones) and minor tuffs (Beukes 1980, Beukes 1986, Sumner 2002, Eriksson *et al.* 2006, Sumner & Beukes 2006) are present in this area. The Campbellrand carbonate bedrocks in the area are karstified and most likely not exposed at the surface.

At the western side of the Maremane Dome (Campbell Rand carbonates, Asbesheuwels Banded Iron Formation and Koegas quartzites and iron formation) a major unconformity exists at the base of the Palaeoproterozoic Elim Group (basal Keis Supergroup), This unconformity (about 2.2-2.0 Ga) cuts the folded Ghaap Group succession and is associated with the development of manganese and iron ores. These ores are extensively mined in the Sishen – Postmasburg region of Griqualand West. These ores are associated with the palaeokarst-related Manganore Formation overlying the Campbell Rand Subgroup carbonates of the Maremane Dome as well as the Gamagara Formation at the base of the Elim Group. In the past the Elim Group was included in the Olifantshoek Group (Schalkwyk 2005, Van Niekerk 2006, Da Silva 2011, Cairncross & Beukes 2013, Smith & Beukes 2016). In the greater Kathu region, the Postmasburg group comprise of basaltic to andesitic lavas of the Ongeluk Formation (dated to 2.2 Ga) that crops out south of the Gamagara River.

In the Sishen region the older Precambrian rocks are mantled by the late Cretaceous to Late Caenozoic aeolian sands, clays, calcretes and gravels of the Kalahari Group Group [approximately Ca 65 – 2.5 million years old (Ma)]. Studies north west of the proposed development site has shown that the Kalahari Group sediments that overlies the Precambrian rocks are about 80 m thick (Haddon, 2005). The earliest Kalahari beds are assigned to the Wessels Formation (basal gravels) and Budin Formation (calcareous clays) and is probably Late Cretaceous in age (Partridge *et al.* 2006).

The top 15 m of the Kalahari sediments consist of clays, calcretised siltstones, and pebbly horizons with the occurrence of solution hollows along joint surfaces (10 m from the surface). Calcretised silcretes with *in situ* brecciation are present close to the surface. Thick pedogenic calcretes (Plio-Pleistocene Mokalanen Formation) are mapped along the Ga-Mogara drainage line and underlies the Kalahari sands in this region. These deposits

indicate the seasonally arid climates over the last five million years (Truter *et al.* 1938; Boardman and Visser 1958). Surface limestones may be upt o 20 m thick and are locally conglomeratic with clasts of reworked calcrete and foreign pebbles. These limestones might be secondarily silicified.

Pleistocene Kalahari sands (Gordonia Formation) has been described to mantle thick calcretes and downwasted surface gravels (Almond 2013). He described a range of calcrete types namely gravelly, brecciated, silicified, honeycomb and karstified facies, the latter with a associated sand- or gravel-infilled solution hollows

Older terrace gravels are described from the banks of the Ga-Mogara drainage line north and east of the study area. But, none of these deposits underlies the proposed development footprint. Unconsolidated, reddish-brown aeolian sands of the Quaternary Gordonia Formation are present in the Sishen area.These sands are Late Pliocene / Early Pleistocene to Recent in age due to the Middle to Later Stone Age stone tools (Dingle *et al*., 1983, p. 291) found in them. Recent studies has dated the Pliocene - Pleistocene boundary from 1.8Ma back to 2.588 Ma and placed the Gordonia Formation almost completely within the Pleistocene Epoch.

The fossil assemblages of the Kalahari are generally high in diversity and occur over a wide range. These fossils represent terrestrial plants and animals with a close resemblance to living forms. Fossil assemblages include bivalves, diatoms, gastropod shells, ostracods and trace fossils. Late Cenozoic calcrete may comprise of bones, horn corns as well as mammalian teeth. Tortoise remains have also been uncovered as well as trace fossils which includes termite and insect's burrows and mammalian trackways. Amphibian and crocodile remains have been uncovered where the depositional settings in the past were wetter. Fossils are mostly associated with ancient lakes, pans and river systems.

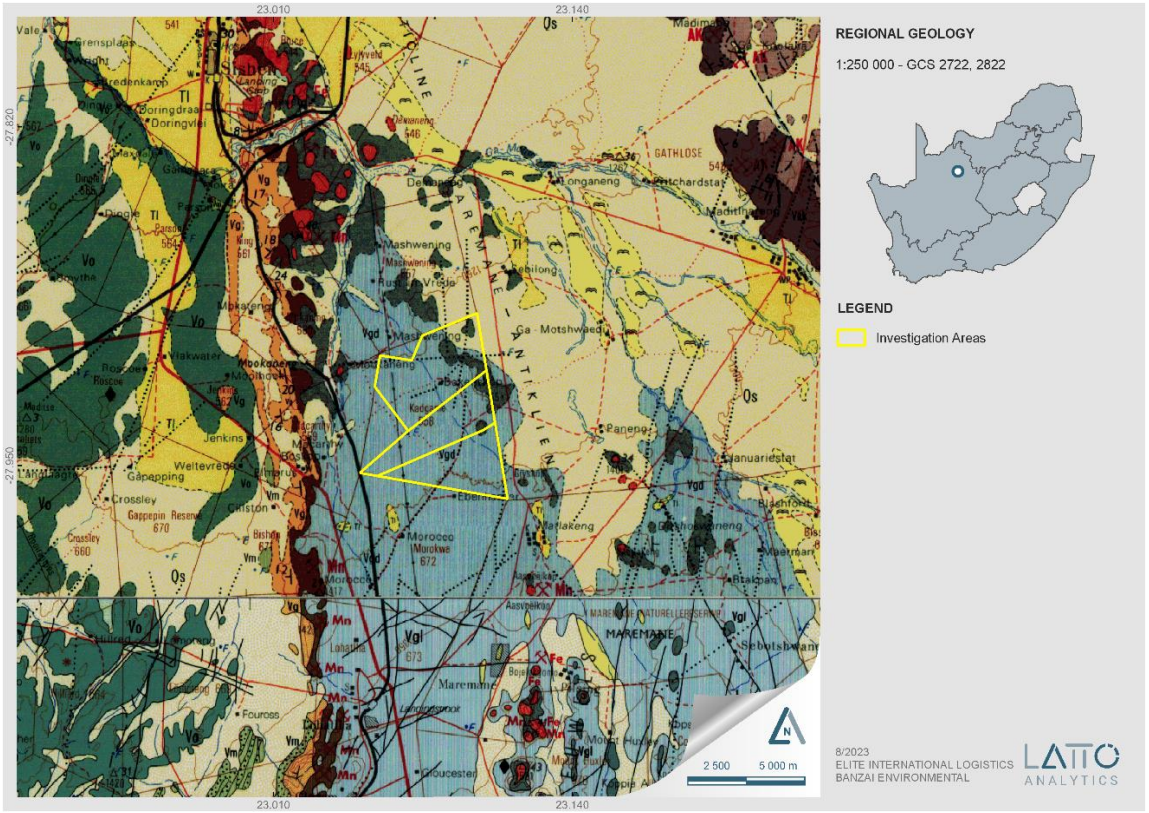
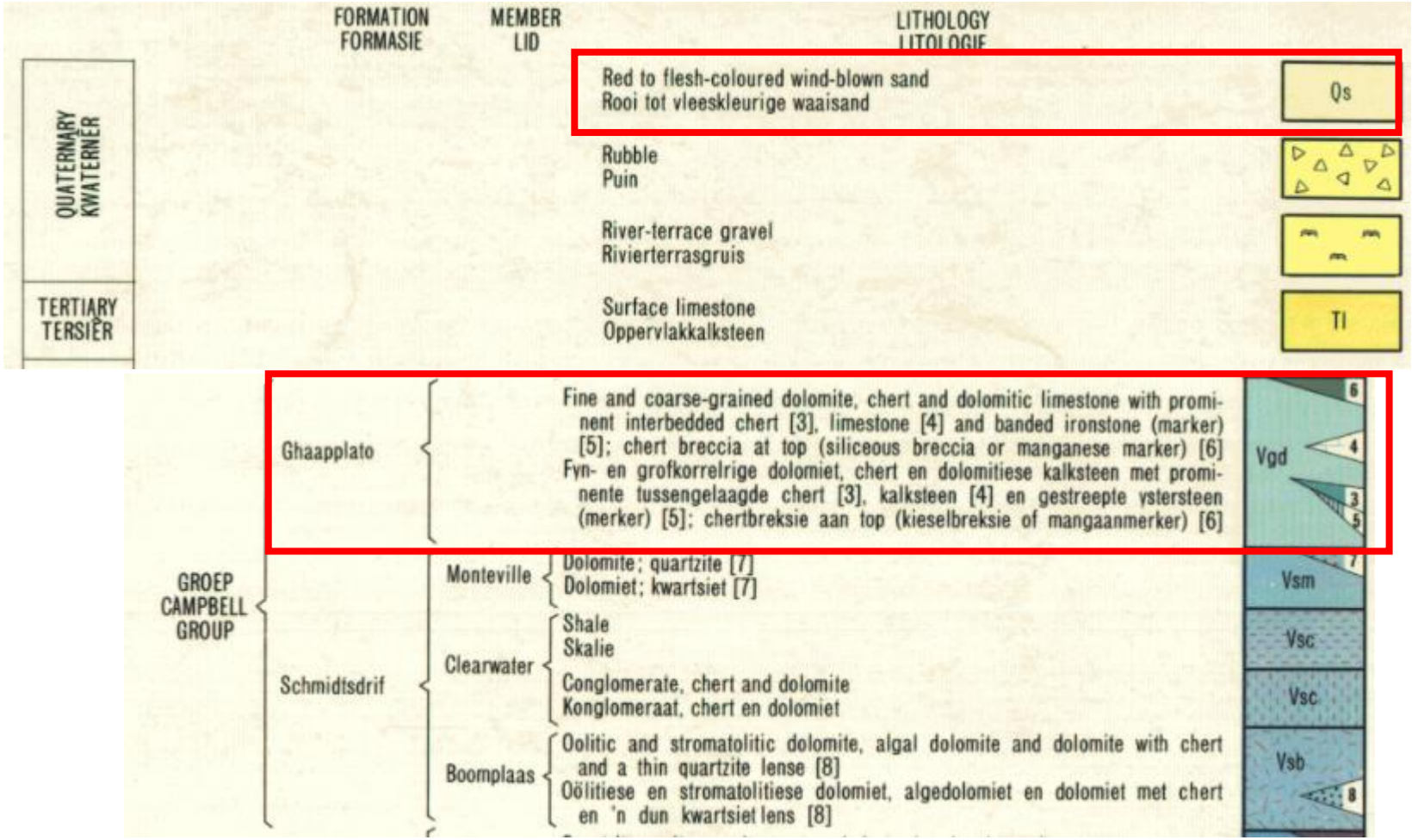


***Figure 3**: Extract of the 1: 250 000 Kuruman 2722 (1995) Geological Map (Council of Geosciences, Pretoria) indicating that the PR application near Kathu in the Northern Cape is underlain by the Campbell Rand Subgroup (Vgd, Ghaap Group, Transvaal Supergroup) and sands of the Kalahari Group (Qs).*

Table 3: Legend (modified) of the 1: 250 000 Kuruman 2722 (1979) Geological Map (Council of Geosciences, Pretoria)



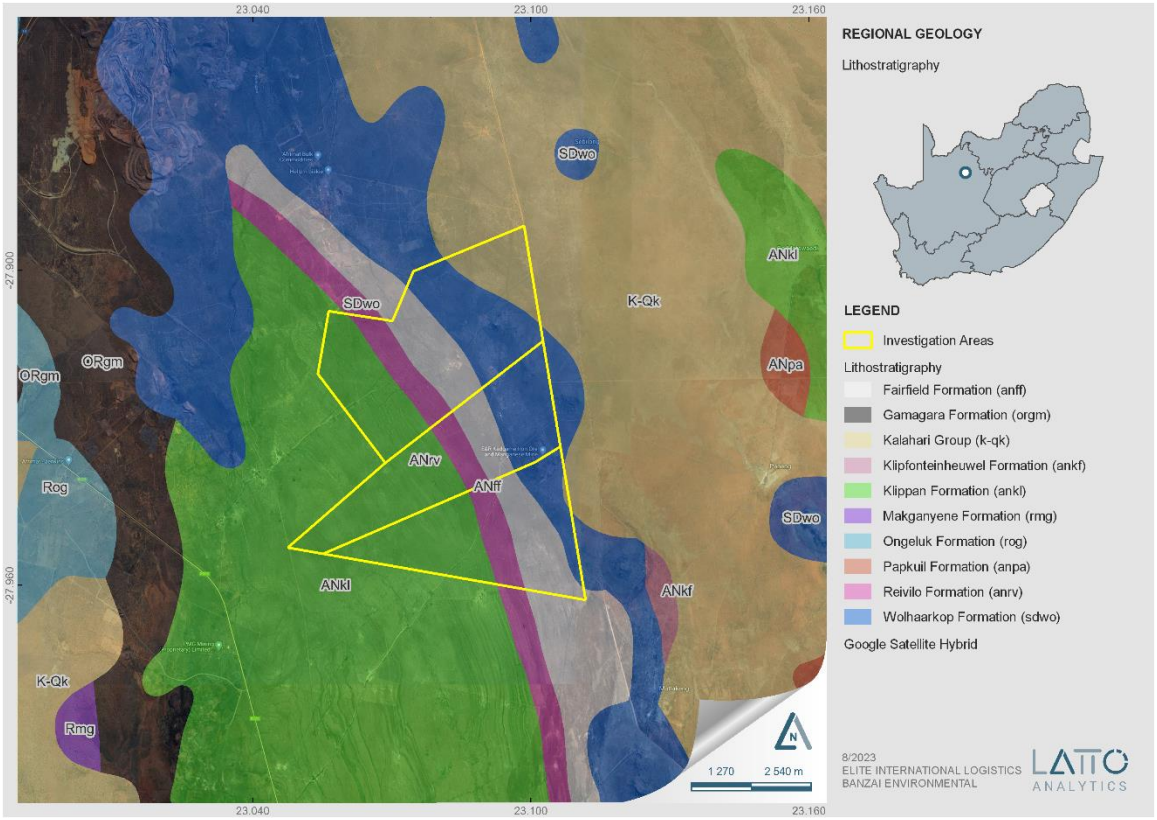


***Figure 4**: Updated Geology (Council for Geosciences, Pretoria) indicates that the development is underlain by sediments of the Kalahari Group as well as the* Reivilo, Fairfield, Klippan and Wolhaarkop Formations of the Cambell Rand Subgroup (Ghaap Group, Transvaal Supergroup).

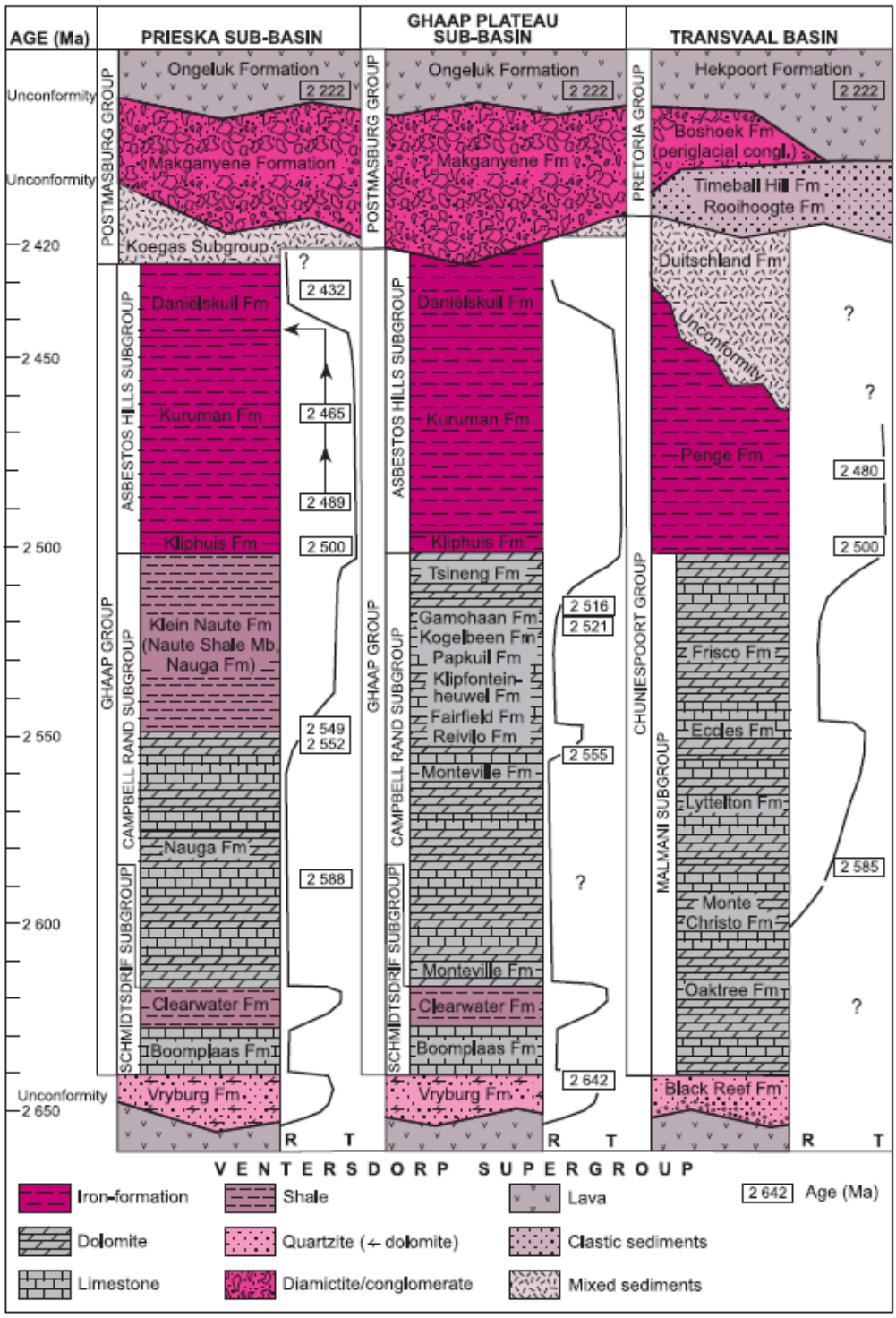


***Figure 5**: Stratigraphy of the Transvaal Supergroup (Ghaap Plateau Sub-basin, indicated in the middle column). Precambrian bedrock units represented in the study area is indicated by the red arrow (Modified from Eriksson et al. 2006).*

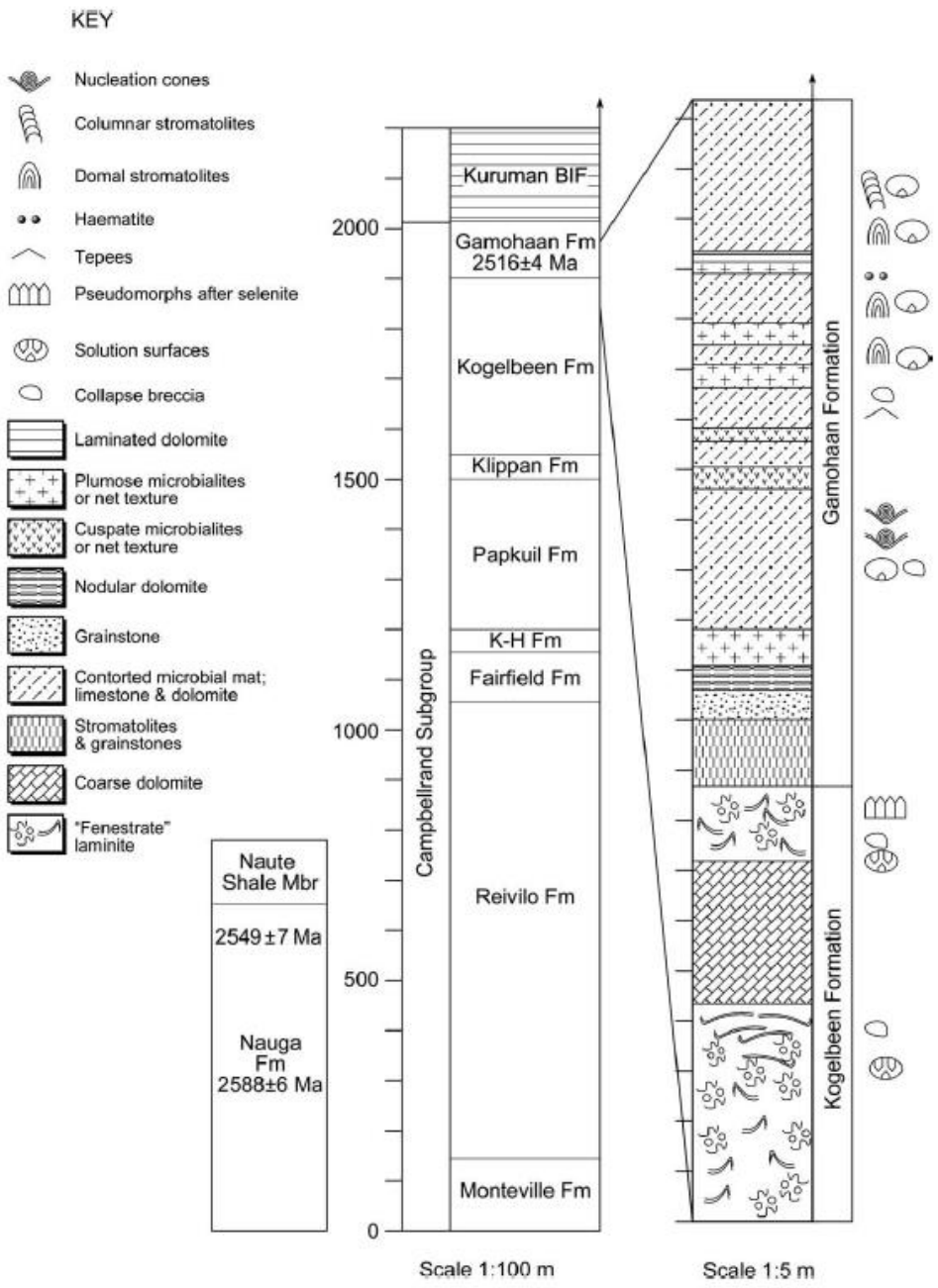


***Figure 6**: Stratigraphy of the Campbell Rand Supergroup indicating the main lithologies and sedimentary features (Taken from Gardine et al, 2005).*

Table 4: Fossil Heritage probably present in the development footprint (modified from Palaeotechnical Report, Almond and Pether 2009).

Subgroup/ sequence	Group	Formation	Fossil Heritage
Tertiary-Quaternary	Kalahari	-	Terrestrial organisms include trace fossils, ostracods, bivalves, gastropod shells, diatoms and trace fossils. Late Cenozoic calcrete may comprise of bones, horn corns as well as mammalian teeth. Tortoise remains have also been uncovered as well as trace fossils which includes termite and insect's burrows and mammalian trackways.
Griqualand West Super Group	Campbell Rand Subgroup	Ghaapplato	Stromatolites e.g., Cyanobacterial microfossils

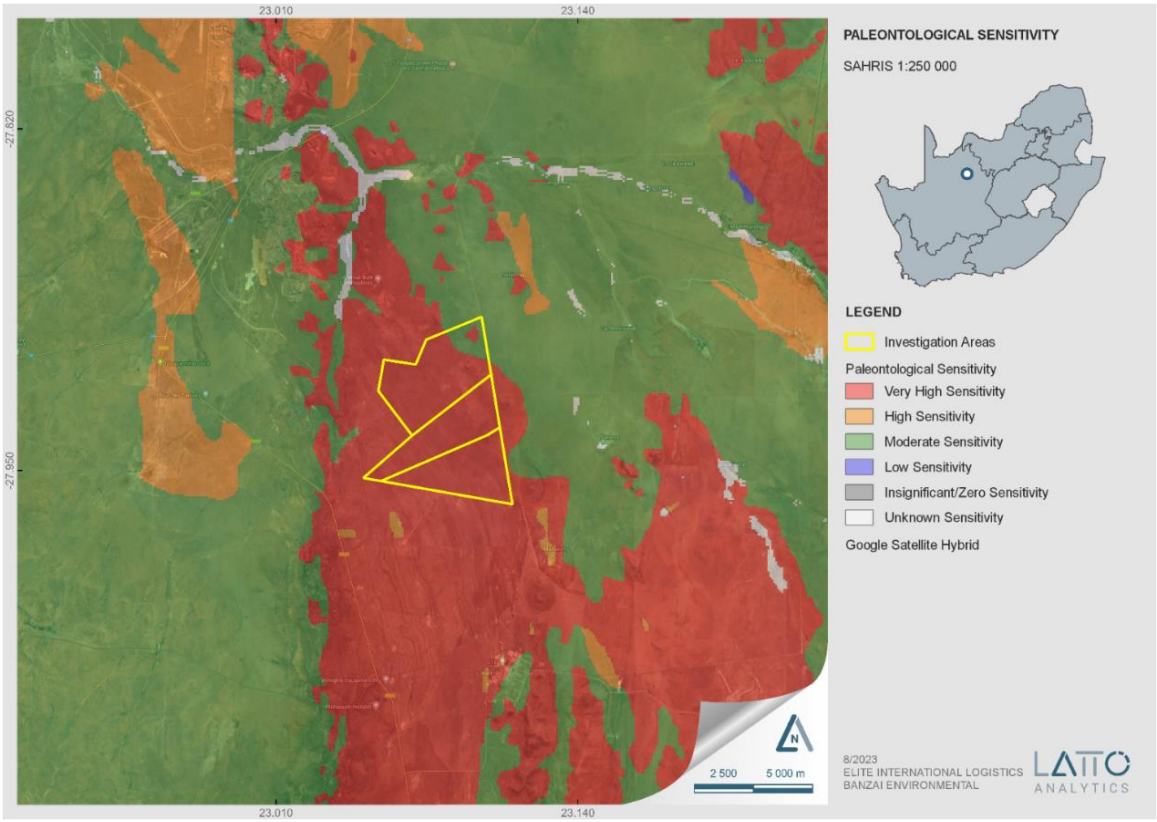
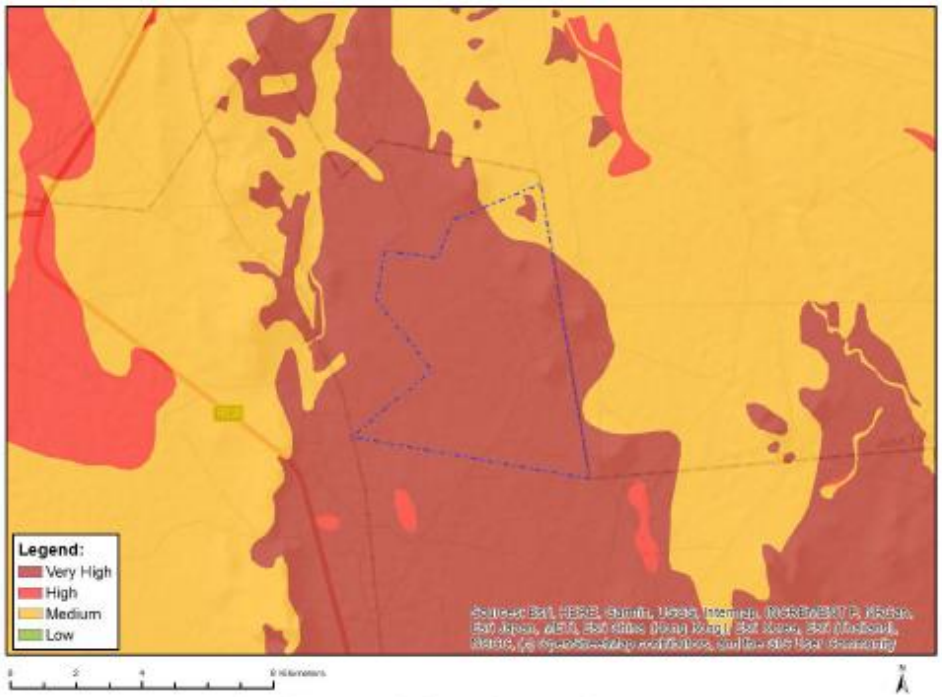


Figure 7 *: Extract of the 1 in 250 000 SAHRIS PalaeoMap map (Council of Geosciences) indicates that the Palaeontological Sensitivity is Very High (red) and Moderate (green).*

***Table 5**: Palaeontological Sensitivity on SAHRIS*

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.

MAP OF RELATIVE PALEONTOLOGY THEME SENSITIVITY



Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
X			

Sensitivity Features:

Sensitivity	Feature(s)
Medium	Features with a Medium paleontological sensitivity
Very High	Features with a Very High paleontological sensitivity

***Figure 8**: Palaeontological Sensitivity generated by the National Environmental Web-Based Screening indicating the Very High Palaeontological Sensitivity of the proposed development, while areas with a Medium Sensitivity also underlies the study area.*

6 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).
- A Google Earth map with polygons of the proposed development was obtained from Milnex cc.
- 1: 250 000 Kuruman 2722 (1978) Geological Map (Council of Geosciences, Pretoria)
- Updated geology (Council of Geosciences, (Pretoria).

- Palaeosensitivity map on SAHRIS website.
- The National Environmental Web-based Screening Tool.

7 IMPACT ASSESSMENT METHODOLOGY

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

- Construction.
- Operation; and
- Decommissioning.

Where necessary, the proposal for mitigation or optimisation of an impact should be detailed. A brief discussion of the impact and the rationale behind the assessment of its significance should also be included. The rating system is applied to the potential impacts on the receiving environment and includes an objective evaluation of the mitigation of the impact. In assessing the significance of each impact, the following criteria is used:

Table 6: The rating system

NATURE		
The Nature of the Impact is the possible destruction of fossil heritage		
GEOGRAPHICAL EXTENT		
This is defined as the area over which the impact will be experienced.		
1	Site	The impact will only affect the site.
2	Local/district	Will affect the local area or district.
3	Province/region	Will affect the entire province or region.
4	International and National	Will affect the entire country.
PROBABILITY		
This describes the chance of occurrence of an impact.		
1	Unlikely	The chance of the impact occurring is extremely low (Less than a 25% chance of occurrence).

2	Possible	The impact may occur (Between a 25% to 50% chance of occurrence).
3	Probable	The impact will likely occur (Between a 50% to 75% chance of occurrence).
4	Definite	Impact will certainly occur (Greater than a 75% chance of occurrence).
DURATION		
This describes the duration of the impacts. Duration indicates the lifetime of the impact as a result of the proposed activity.		
1	Short term	The impact will either disappear with mitigation or will be mitigated through natural processes in a span shorter than the construction phase (0 – 1 years), or the impact will last for the period of a relatively short construction period and a limited recovery time after construction, thereafter it will be entirely negated (0 – 2 years).
2	Medium term	The impact will continue or last for some time after the construction phase but will be mitigated by direct human action or by natural processes thereafter (2 – 10 years).
3	Long term	The impact and its effects will continue or last for the entire operational life of the development, but will be mitigated by direct human action or by natural processes thereafter (10 – 30 years).
4	Permanent	The only class of impact that will be non-transitory. Mitigation either by man or natural process will not occur in such a way or such a time span that the impact can be considered indefinite.
INTENSITY/ MAGNITUDE		
Describes the severity of an impact.		
1	Low	Impact affects the quality, use and integrity of the system/component in a way that is barely perceptible.
2	Medium	Impact alters the quality, use and integrity of the system/component but system/component still

		continues to function in a moderately modified way and maintains general integrity (some impact on integrity).
3	High	Impact affects the continued viability of the system/ component and the quality, use, integrity and functionality of the system or component is severely impaired and may temporarily cease. High costs of rehabilitation and remediation.
4	Very high	Impact affects the continued viability of the system/component and the quality, use, integrity and functionality of the system or component permanently ceases and is irreversibly impaired. Rehabilitation and remediation often impossible. If possible rehabilitation and remediation often unfeasible due to extremely high costs of rehabilitation and remediation.

REVERSIBILITY		
This describes the degree to which an impact can be successfully reversed upon completion of the proposed activity.		
1	Completely reversible	The impact is reversible with implementation of minor mitigation measures.
2	Partly reversible	The impact is partly reversible but more intense mitigation measures are required.
3	Barely reversible	The impact is unlikely to be reversed even with intense mitigation measures.
4	Irreversible	The impact is irreversible, and no mitigation measures exist.
IRREPLACEABLE LOSS OF RESOURCES		
This describes the degree to which resources will be irreplaceably lost as a result of a proposed activity.		
1	No loss of resource	The impact will not result in the loss of any resources.
2	Marginal loss of resource	The impact will result in marginal loss of resources.
3	Significant loss of resources	The impact will result in significant loss of resources.

4	Complete loss of resources	The impact is result in a complete loss of all resources.
CUMULATIVE EFFECT		
This describes the cumulative effect of the impacts. A cumulative impact is an effect which in itself may not be significant but may become significant if added to other existing or potential impacts emanating from other similar or diverse activities as a result of the project activity in question.		
1	Negligible cumulative impact	The impact would result in negligible to no cumulative effects.
2	Low cumulative impact	The impact would result in insignificant cumulative effects.
3	Medium cumulative impact	The impact would result in minor cumulative effects.
4	High cumulative impact	The impact would result in significant cumulative effects
SIGNIFICANCE		
Significance is determined through a synthesis of impact characteristics. Significance is an indication of the importance of the impact in terms of both physical extent and time scale, and therefore indicates the level of mitigation required. The calculation of the significance of an impact uses the following formula: (**Extent + probability + reversibility + irreplaceability + duration + cumulative effect) x magnitude/intensity = X.** The summation of the different criteria will produce a non-weighted value. By multiplying this value with the magnitude/intensity, the resultant value acquires a weighted characteristic which can be measured and assigned a significance rating.		
Points	Impact significance rating	Description
6 to 28	Negative low impact	The anticipated impact will have negligible negative effects and will require little to no mitigation.
6 to 28	Positive low impact	The anticipated impact will have minor positive effects.
29 to 50	Negative medium impact	The anticipated impact will have moderate negative effects and will require moderate mitigation measures.
29 to 50	Positive medium impact	The anticipated impact will have moderate positive effects.

51 to 73	Negative high impact	The anticipated impact will have significant effects and will require significant mitigation measures to achieve an acceptable level of impact.
51 to 73	Positive high impact	The anticipated impact will have significant positive effects.
74 to 96	Negative very high impact	The anticipated impact will have highly significant effects and are unlikely to be able to be mitigated adequately. These impacts could be considered "fatal flaws".
74 to 96	Positive very high impact	The anticipated impact will have highly significant positive

7.1 Summary of Impact Tables

Loss of fossil heritage will be a negative impact. Only the site will be affected by the proposed development. The expected duration of the impact is assessed as potentially permanent to long term. In the absence of mitigation procedures, the damage or destruction of any palaeontological materials will be permanent. Impacts on palaeontological heritage during the construction phase could potentially occur and are regarded as having a high probability. As fossil heritage will be destroyed the impact is irreversible. The significance of the impact occurring will be medium pre-mitigation and low post-mitigation.

Table 7: Summary of Impact Tables

	Site	Probability	Duration	Magnitude	Reversibility	Irreplicable Loss	Cumulative Effect	Significance
Pre-mitigation	1	2	4	3	4	4	2	51

8 FINDINGS AND RECOMMENDATIONS

The study area is largely underlain by the Cambell Rand Subgroup of the Ghaap Group (Transvaal Supergroup), with a small portion in the east underlain by red to flesh coloured wind-blown sand. Updated geology produced by the Council of Geosciences (Pretoria) refined the geological map and indicates that the study area is underlain by the Kalahari Group as well as the different Formations of the Cambel Rand Group that includes the Reivilo,

Fairfield, Klippan and Wolhaarkop Formations. According to the PalaeoMap on the South African Heritage Resources Information System (SAHRIS) database, the Palaeontological Sensitivity of the Ghaap Group is Very High while that of the Kalahari Group is Moderate (Almond and Pether, 2009; Almond *et al*., 2013). The suggested location is classified as having a Very High Palaeontology Theme Sensitivity in the DEA Screening Report.

A Very High Palaeontological Significance is this allocated to this project. It is thus recommended that an EIA level palaeontology report should be conducted to assess the value and prominence of fossils in the development area and the effect of the proposed development on the palaeontological heritage. The purpose of the EIA Report is to elaborate on the issues and potential impacts identified during the scoping phase. A Phase 1 field-based assessment would be conducted with research in the site-specific study area as well as a comprehensive assessment of the impacts identified during the scoping phase.

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APPENDIX A: CURRICULUM VITAE

PROFESSION:	Palaeontologist
YEARS' EXPERIENCE:	30 years in Palaeontology
EDUCATION:	B.Sc Botany and Zoology, 1988 University of the Orange Free State
	B. Sc (Hons) Zoology, 1991 University of the Orange Free State
	Management Course, 1991 University of the Orange Free State
	M. Sc. *Cum laude* (Zoology), 2009 University of the Free State

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

MEMBERSHIP

Palaeontological Society of South Africa (PSSA) 2006-currently

EMPLOYMENT HISTORY

Part time Laboratory assistant	Department of Zoology & Entomology University of the Free State Zoology 1989-1992
Part time laboratory assistant	Department of Virology University of the Free State Zoology 1992
Research Assistant	National Museum, Bloemfontein 1993 – 1997
Principal Research Assistant and Collection Manager	National Museum, Bloemfontein 1998–2022

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