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14 April 2022

Dr Ragna Redelstorff  
Heritage Officer Archaeology, Palaeontology & Meteorites Unit  
South African Heritage Resources Agency  
111 Harrington Street  
Cape Town 8001

Dear Dr Redelstorff

**RE: Request for Exemption of any Palaeontological Impact Assessment for the proposed Siviti River Lodge and crossings on Farm Guernsey 81, between Acornhoek and Timbavati, Limpopo Province**

In my capacity as a professional palaeontologist, I am requesting exemption for palaeontological impact assessment in terms of the National Heritage Resources Act (Act 25 of 1999) and the National Environmental Management Act (Act 107 of 1998) which requires that the proposed development must be preceded by the relevant impact assessment, in this case for palaeontology.

The owners of the property, Farm Guernsey 81, propose to construct a river lodge on portions 0, 18, 216 and 217 (Fig. 1). The entire farm lies on non-fossiliferous rocks of the Basement biotite gneiss. The rocks are metamorphosed igneous rocks and pre-date all known life forms (Plumstead, 1989; Hunter et al., 2006) as they are around 2650 million years old. They are the crustal rocks of the Kaapvaal Craton.

There is no chance of finding any fossils in the Basement gneiss and this is confirmed by the grey colouration in the SAHRIS palaeosensitivity map (Fig. 3). Since there would be no impact on the fossil heritage we request that not palaeontological impact assessment be required, and as far as the palaeontology is concerned, that the Siviti River Lodge project be authorised.

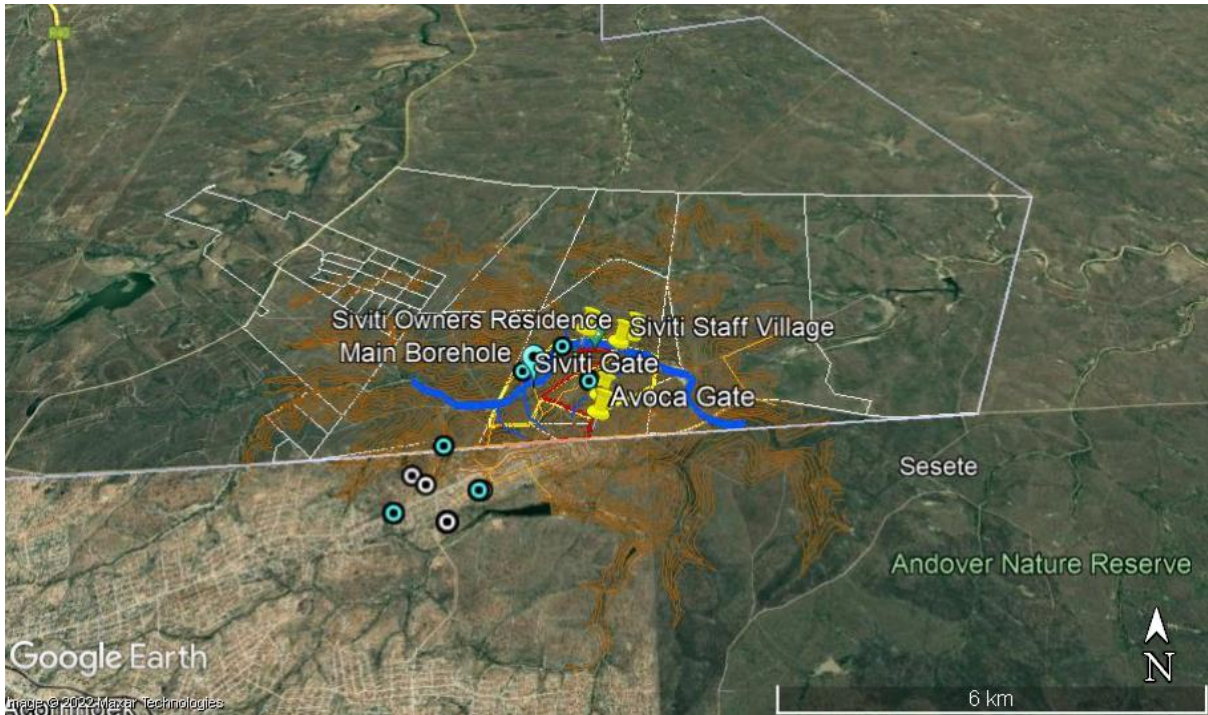


Figure 1: Google Earth site map for the proposed Siviti River Lodge on Farm Guernsey 81.

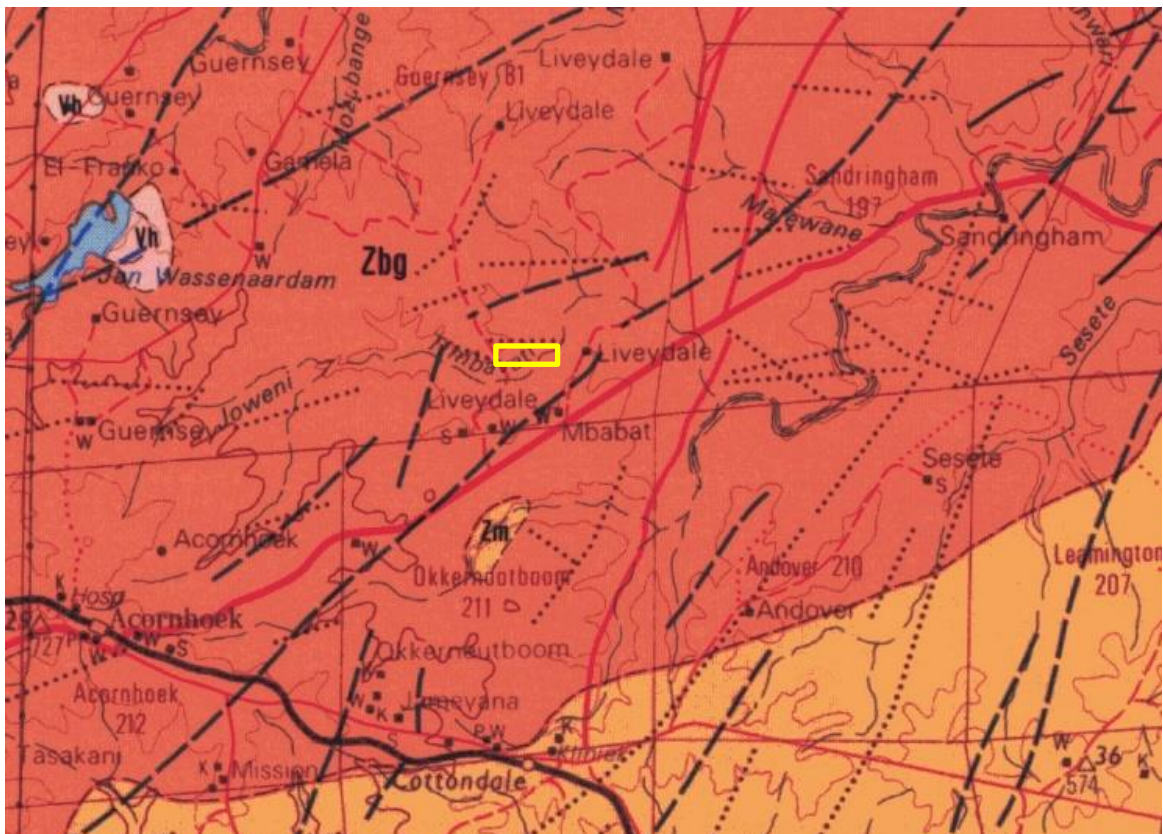


Figure 2: Geological map of the area around the Siviti River Lodge site indicated within the yellow rectangle. Abbreviations of the rock types are: Zbg = Basement biotite gneiss. Map enlarged from the Geological Survey 1: 250 000 map 2430 Pilgrims Rest.

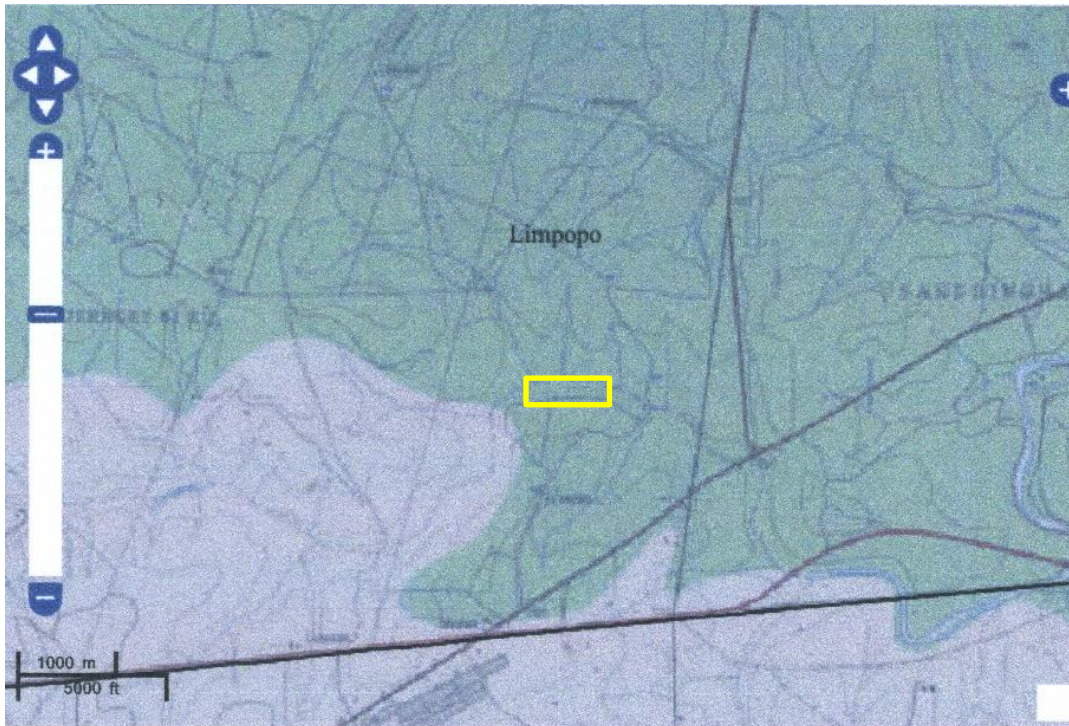


Figure 3: SAHRIS palaeosensitivity map for the site for the proposed Siviti River Lodge shown within the yellow rectangle. Background colours indicate the following degrees of sensitivity: red = very highly sensitive; orange/yellow = high; green = moderate; blue = low; grey = insignificant/zero.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'M Bamford'.

Prof Marion Bamford  
Palaeobotanist; PhD (Wits 1990)

**Literature cited:**

Hunter, D.R., Johnson, M.R., Anhaeusser, C.R., Thomas, R.j., 2006. Introduction. In: Johnson, M.R., Anhaeusser, C.R. and Thomas, R.J., (Eds). The Geology of South Africa. Geological Society of South Africa, Johannesburg / Council for Geoscience, Pretoria. Pp 1-8.

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

## **Declaration of Independence**

This letter has been compiled by Professor Marion Bamford, of the University of the Witwatersrand, sub-contracted by Kudzala, Lydenburg, South Africa. The views expressed in this report are entirely those of the author and no other interest was displayed during the decision making process for the Project.

Specialist: Prof Marion Bamford

Signature:

A handwritten signature in blue ink, appearing to read 'MKBamford', with a horizontal line underneath.