



# PALAEONTOLOGICAL IMPACT ASSESSMENT

## MOGALAKWENA MINING COMPLEX

APRIL 2023

LP30/5/1/2/2/50 MR

COMPILED FOR: Alta van Dyk  
Environmental



## 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.

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**SIGNATURE:**



The 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: Checklist for Specialist studies conformance with Appendix 6 of the EIA Regulations of 2014 (as amended)*

<b>Requirements of Appendix 6 – GN R326 EIA Regulations of 7 April 2017</b>	<b>The relevant section in the report</b>	<b>Comment where not applicable.</b>
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 vita;	Section 2 – refer to <b>Appendix A</b>	-
(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 3	-
(cA) An indication of the quality and age of base data used for the specialist report;	Section 5 –	-
(cB) a description of existing impacts on the site, cumulative impacts of the proposed development and levels of acceptable change;	Section 7	-
(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	-



<b>Requirements of Appendix 6 – GN R326 EIA Regulations of 7 April 2017</b>	<b>The relevant section in the report</b>	<b>Comment where not applicable.</b>
(e) a description of the methodology adopted in preparing the report or carrying out the specialised process inclusive of equipment and modelling used;	Section 3 Approach and Methodology	-
(f) 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 alternative;	Section 1 & 8	-
(g) An identification of any areas to be avoided, including buffers;	Section 1 & 8	-
(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	-
(i) A description of any assumptions made and any uncertainties or gaps in knowledge;	Section 3.1 – 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	-



<b>Requirements of Appendix 6 – GN R326 EIA Regulations of 7 April 2017</b>	<b>The relevant section in the report</b>	<b>Comment where not applicable.</b>
(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 EMP, 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	Not applicable. A public consultation process was handled as part of the Environmental Impact Assessment (EIA) and Environmental Management Plan (EMP) process.
(p) A summary and copies of any comments that were received during any consultation process;	N/A	Not applicable. To date, no comments regarding heritage resources that require input from a specialist have been raised.
(q) Any other information requested by the competent authority;	N/A	Not applicable.



<b>Requirements of Appendix 6 – GN R326 EIA Regulations of 7 April 2017</b>	<b>The relevant section in the report</b>	<b>Comment where not applicable.</b>
(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 4 compliance with SAHRA guidelines	-



## EXECUTIVE SUMMARY

Banzai Environmental was appointed by Alta van Dyk Environmental to conduct the Palaeontological Impact Assessment (PIA) for the Mogalakwena Mining Complex (MC), Mogalakwena Local Municipality, Waterberg District Municipality in Limpopo Province. In accordance with the National Environmental Management, 1998 (Act No. 107 of 1998) (NEMA) and to comply with the National Heritage Resources Act, 1999 (Act No. 25 of 1999, section 38) (NHRA), this PIA 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 and to provide feasible recommendations to mitigate possible damage to fossil resources.

The proposed mining development is underlain by rocks of the Bushveld Complex, Archaean Granitoid Intrusions as well as the Malmani Subgroup (Chuniespoort Group of the Transvaal Supergroup

According to the PalaeoMap on the South African Heritage Resources Information System (SAHRIS) database, the Palaeontological Sensitivity of the Bushveld Complex and Archaean Granitoid Intrusions is Zero as they are igneous in origin and thus unfossiliferous, while the Malmani Subgroup has a Very High Palaeontological Sensitivity (Almond and Pether 2008, SAHRIS website). The Malmani Subgroup is known for stromatolitic carbonates with a range of marine to intertidal stromatolites and organic walled microfossils.

The Palaeotechnical report of the Limpopo Province (Groenewald et, 2014) indicates that Cave deposits may be present in the development footprint. As the Makapansgat Valley World Heritage Site is located within a 30km radius of the MC and it is probable that cave deposits are present near the ground surface in the karstic weathered outcrop area. The Palaeontological Sensitivity of these Cave deposits is Very High. Quaternary cave deposits are not mapped on the geological maps (1:1million scale). The Very High Palaeontological Sensitivity of the Cave deposits and Malmani Subgroup triggered a site investigation.

A site-specific field survey of the development footprint was conducted on foot and by motor vehicle in March 2023. **No fossiliferous outcrops and no karstic weathered outcrop areas were detected in the proposed development area.** The rarity of fossil heritage in the proposed development footprint suggests that the impact of the development will be of a Low significance in palaeontological terms. It is therefore considered that the proposed development is deemed appropriate and feasible and will not lead to damaging impacts on the palaeontological resources of the area. The construction of the development may thus be permitted in its whole extent, as the development footprint is not considered sensitive in terms of palaeontological resources.





However, if fossil remains are discovered during any phase of construction, either on the surface or exposed by excavations the Mogalakwena Mining Complex's Chance **Find Protocol** must be implemented by the ECO/site manager in charge of these developments. These discoveries ought to be protected (if possible, *in situ*) and the ECO/site manager must report to South African Heritage Resources 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](http://www.sahra.org.za)) so that mitigation (recording and collection) can be carry out by a paleontologist.

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



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## 1 INTRODUCTION

Mogalakwena Mine (MM) is an Anglo-American Platinum (AAP) Rustenburg Platinum Mines (Pty) Ltd (RPM) owned platinum mine situated in the Limpopo Province of South Africa, 70 and 30 km, respectively, from the towns of Polokwane and Mokopane.

Mogalakwena is an opencast mine complex consisting of five opencast pits and two concentrator plants – the Mogalakwena North Concentrator (MNC) and Mogalakwena South Concentrator (MSC) – with the currently planned third concentrator (M3C). Associated with the concentrators are two existing Tailings Storage Facilities (TSF), with two new TSFs planned for the proposed concentrator, namely the Blinkwater Extension Compartment 2 and 3.

The Mogalakwena Mine currently has five individual operational pits of which three will be merged into one super pit (i.e., North Pit, Central Pit and South Pit), while Zwartfontein Pits has one last pushback planned. Due to the development of the underground mine at the Sandsloot Pit, no further pushbacks will be undertaken in the future at the Sandsloot Pit. Furthermore, additional pits are planned at the Mogalakwena Operations ( $\pm 2040$ ). Open pit mining is undertaken by means of the drill, blast, load and haul method of mining.

The mine is currently processing, on average 13 Mtpa (based on 2018 and 2019 figures) and aims to reach 22 Mtpa with the implementation of the M3C (still to be constructed). The M3C is approved for a total milling capacity of 12 Mtpa (including associated infrastructure i.e., crusher and bulk ore sorting facility) whilst maintaining the North Concentrator (MNC) at 9.3 Mtpa and decommissioning the South Concentrator (MSC). The processing facilities will provide a total milling capacity of 22 Mtpa. Processing facilities in the AAP stable includes purification and crystallization, an acid plant, smelting, ore sorter (multi-sensor), electric furnace, hydrochloric acid (reagent), floatation, high pressure acid leach (HPAL), magnetic separation, solvent extraction, electrowinning, dissolving and crystallising.

Commodities mined and processed include Platinum Group Metals (PGMs) i.e., Platinum, Palladium, Rhodium, Iridium, Ruthenium and Gold with Nickel, and Copper as associated base metals.

### 1.1 Future Projects

While both underground and open-pit mining are widely accepted mining processes, there is a greater inclination to expand underground mining when it becomes unfeasible to further extend the open pit operations. The AAP Resource Development Plan (RDP), a strategic planning process, identified five (5) different underground mining areas over the 19 km of strike of Mogalakwena. Mogalakwena Mine intends to exploit the Sandsloot (Zone 1) resources deeper than the current open pit horizons by changing the current mining method from an open pit mining process to an underground mining process (first phase). Studies are currently being undertaken to confirm the optimal development of the underground mine. MM anticipates that the proposed underground operations could extend the life of the mine with between 30-40 years and will similarly be influenced by market conditions, production rates and future underground mining scenarios.



Simultaneous to the development of the underground mine, open pit mining will continue allowing for the final open cuts to continue until optimised shell extent has been reached. South Pit will develop and be extended to bridge South Pit and Central Pit for the further development of the Super Pit. Pit access ramps for the super pit will be maintained to the eastern footwall wall to provide the shortest possible haul route to the Waste Rock Disposal Facilities (WRD's) strategic stockpiles and the primary crushing plant. To allow for final open cut / optimised shell extent, one last pushback/cut is planned for the Zwartfontein Pit.

The development of Sandsloot Underground Mine, resultant changes to the WRD Facilities, the implementation of stormwater management infrastructure at the WRD Facilities and the development of the anthropogenic aquifer's forms part of this Regulatory Process (Section 1.1.1). Included into the approval process are projects such as an additional access road from the N11, and projects aimed at the implementation of new technologies such as the supporting infrastructure to the Hydrogen Production Projects as well as the Permit to Innovate project.

### ***1.1.1 Regulatory Approval Process***

Mogalakwena Complex received an integrated<sup>1</sup> (NEMA and NEM: WA) environmental authorisation (LP30/5/1/2/3/2/1 (050) EM) on 13 August 2020 and a Water Use Licence (WUL) No. 07/A61G/ABCGIJ/9887 on 4 December 2020 supporting the current open pit operations and all associated infrastructure.

**It is the intention of MM to undertake a full Environmental Impact Assessment (EIA) Process in support of the future projects allowing not only for the development of the Sandsloot Underground Mine, continued opencast mining and waste rock disposal, but also for the implementation of new technologies and supporting projects to the mining operations.**

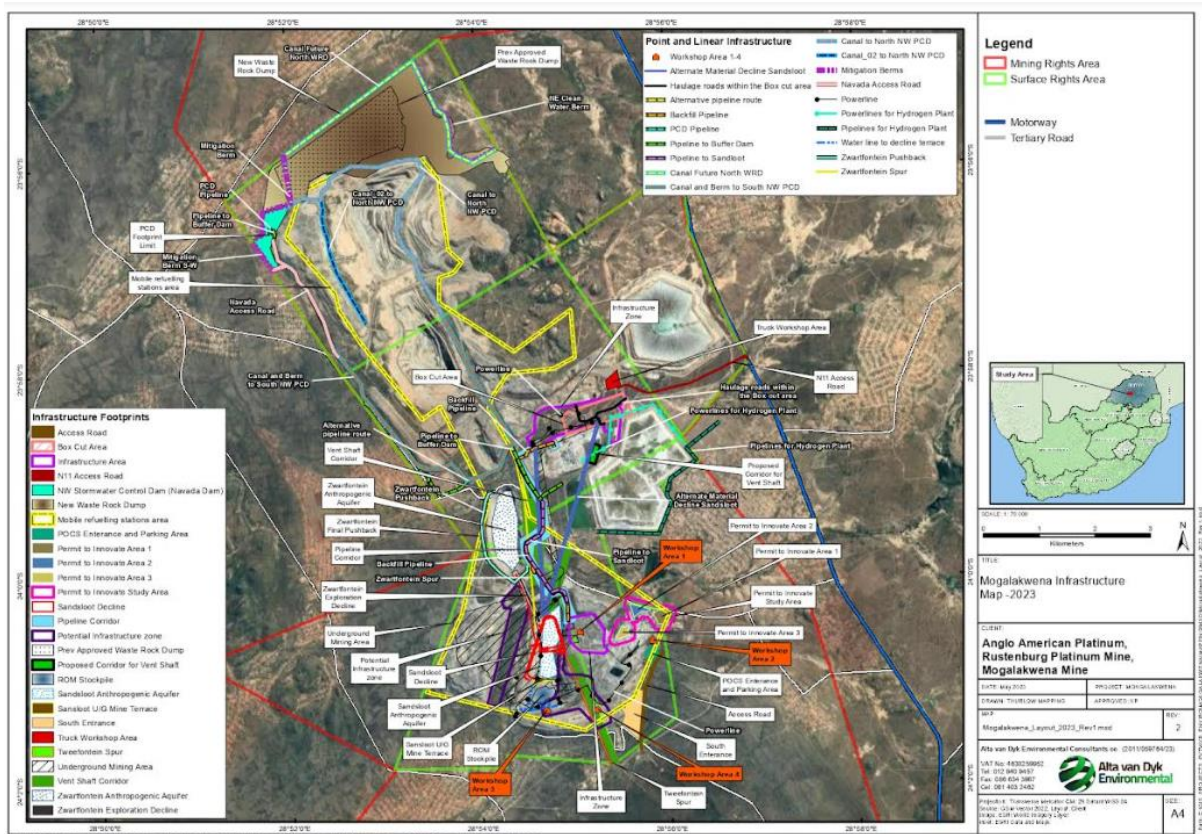
This regulatory approval process will be undertaken in terms of regulations promulgated under Section 22 and 39 of the Mineral and Petroleum Resources Act, 2002 (Act 28 of 2002) (MPRDA) as well as Section 24 (5) and 44 of the National Environmental Management Act (Act 107 of 1998) (NEMA). A Waste Management Licence will be applied for as part of the process in terms of the National Environmental Management: Waste Act, 2008 (Act 59 of 2008). A Water Use Licence will also be applied for in terms of the National Water Act, 1998 (Act 36 of 1998) for the water uses associated with the proposed new activities.

The regulatory approval process supports the development of the following projects:  
Sandsloot Underground Mine inclusive of the Zwartfontein and Tweefontein Spurs;

- Final pushback at the Zwartfontein Pit;

- Development of two in-pit anthropogenic aquifers – Zwartfontein and Sandsloot;
- Further development of the North Waste Rock Disposal Area (Phase 3) and the development of stormwater infrastructure (North-west Pollution Control Dam);
- Changes to the W020 and RS3 Waste Rock Disposal Facilities;
- Development of an area of the implementation and testing of new and innovative technologies (Permit to Innovate: and
- Supporting infrastructure to the Hydrogen Production Facility (Production Scale) Project.

Shallow deposits are generally mined by open pit mining methods as it is economically superior to most underground mining methods with respect to time to first production, production rate, and other technical aspects. However, open pit mining is sensitive to the mining depth because of orebody geometry and haulage cost.



**Figure 1: Regional Locality of the Mogalakwena Mining Complex situated in the Limpopo Province of South Africa.**

While both underground and open-pit mining are widely accepted mining processes, there is a greater inclination to further expand underground mining when it becomes unfeasible to further extend the open pit operations. Shallow deposits are generally mined by open pit mining methods as it is economically superior to most underground mining methods with respect to time to first production, production rate,





and other technical aspects. However, open pit mining is sensitive to the mining depth because of orebody geometry and haulage cost.

Combining the open pit and underground mining methods is referred to as combination mining. In the combination mining method, '*transition point*' refers to the point at which the decision has to be taken whether to extend the pit or switch from open pit to underground. The transition point can be driven by a number of factors including surface constraints, sustainability / financial decision around waste movement (strip ratio), environmental factors and corporate strategy.

The transition to underground mining at Mogalakwena could reduce the long term:

- Surface footprint – open pit and waste rock disposal areas extent;
- Waste rock extraction, movement and storage;
- Surface mineral residue storage (waste rock and a significant portion of tailings used to backfill underground voids);
- Reduces dust, noise and vibration;
- Reduces total water usage;
- Reduces total energy requirements;
- Reduces total carbon consumption; and
- Overall environmental impacts.

The AAP RDP, as strategic planning process, identified five (5) different underground mining areas over the 19 km of strike of Mogalakwena. The 5 underground mining areas include (**Figure 2-3**):

- **Sandsloot (SST) – Zone 1**
- Mogalakwena South (MGS) – Zone 2
- Zwartfontein (ZWF) – Zone 3
- Mogalakwena North (MGN) – Zone 4
- Tweefontein (TWF) – Zone 5

Mogalakwena Mine intends to exploit the Sandsloot (Zone 1) resources deeper than the current open pit horizons by changing the current mining method from an open pit mining process to an underground mining process (first phase). Studies are currently being undertaken to confirm the optimal development of the underground mine. MM anticipates that the proposed underground operations could extend the life of the mine with ~49 years and will similarly be influenced by market conditions, production rates and future underground mining scenarios.

Simultaneous to the development of the underground, the open pit mining will continue allowing for the final open cuts to continue until optimised shell extent has been reached. South Pit will be extended to bridge South Pit and Central Pit for the further development of the super pit. Pit access ramps for the super pit will be maintained to the eastern footwall wall to provide the shortest possible haul route to the





MM has appointed Alta van Dyk Environmental to obtain Environmental Authorization for the Mogalakwena Mining Complex Expansion. In turn Banzai Environmental has been appointed to conduct the Palaeontological Impact Assessment (PIA) as part of a Heritage Impact Assessment of the proposed development.

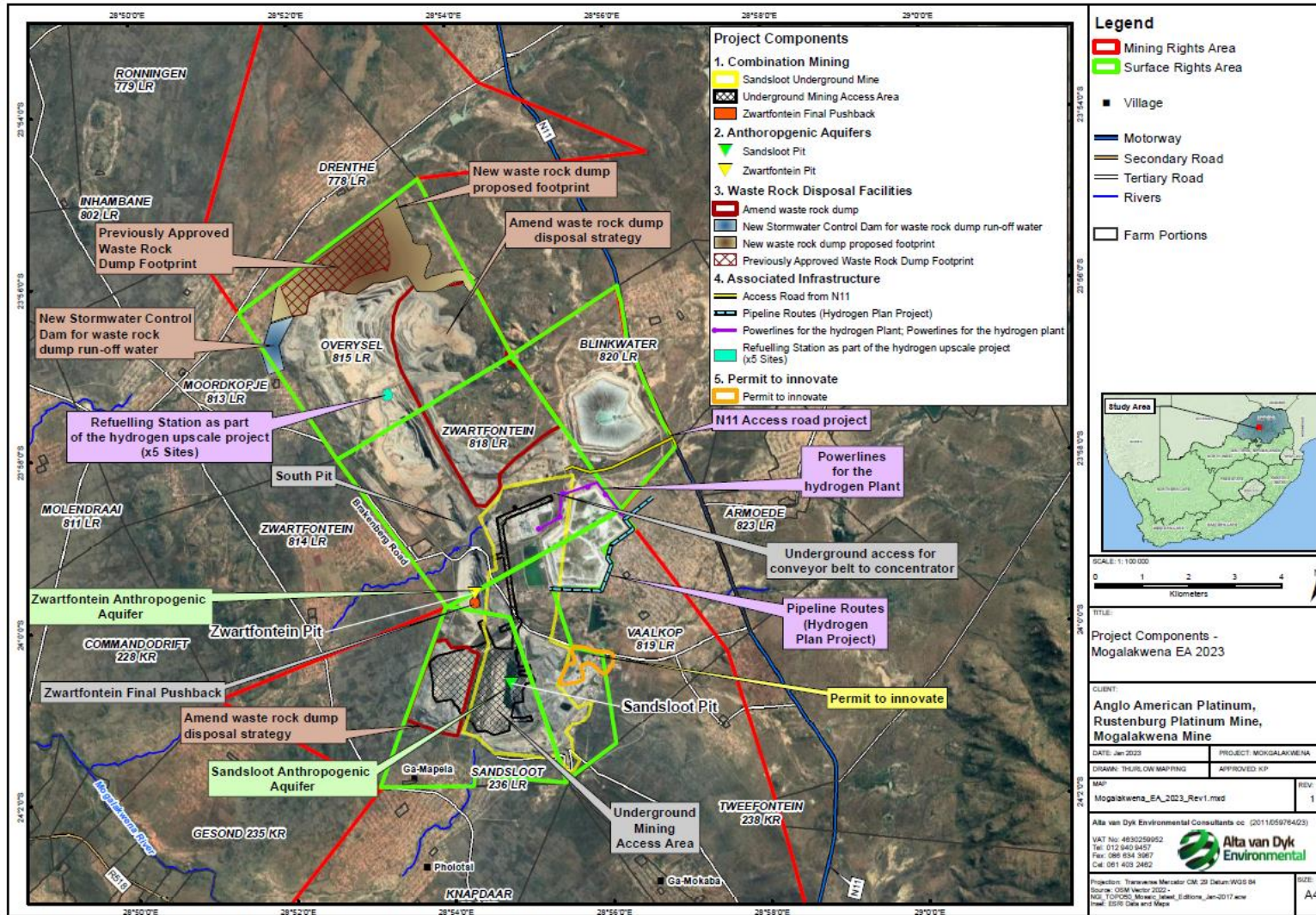
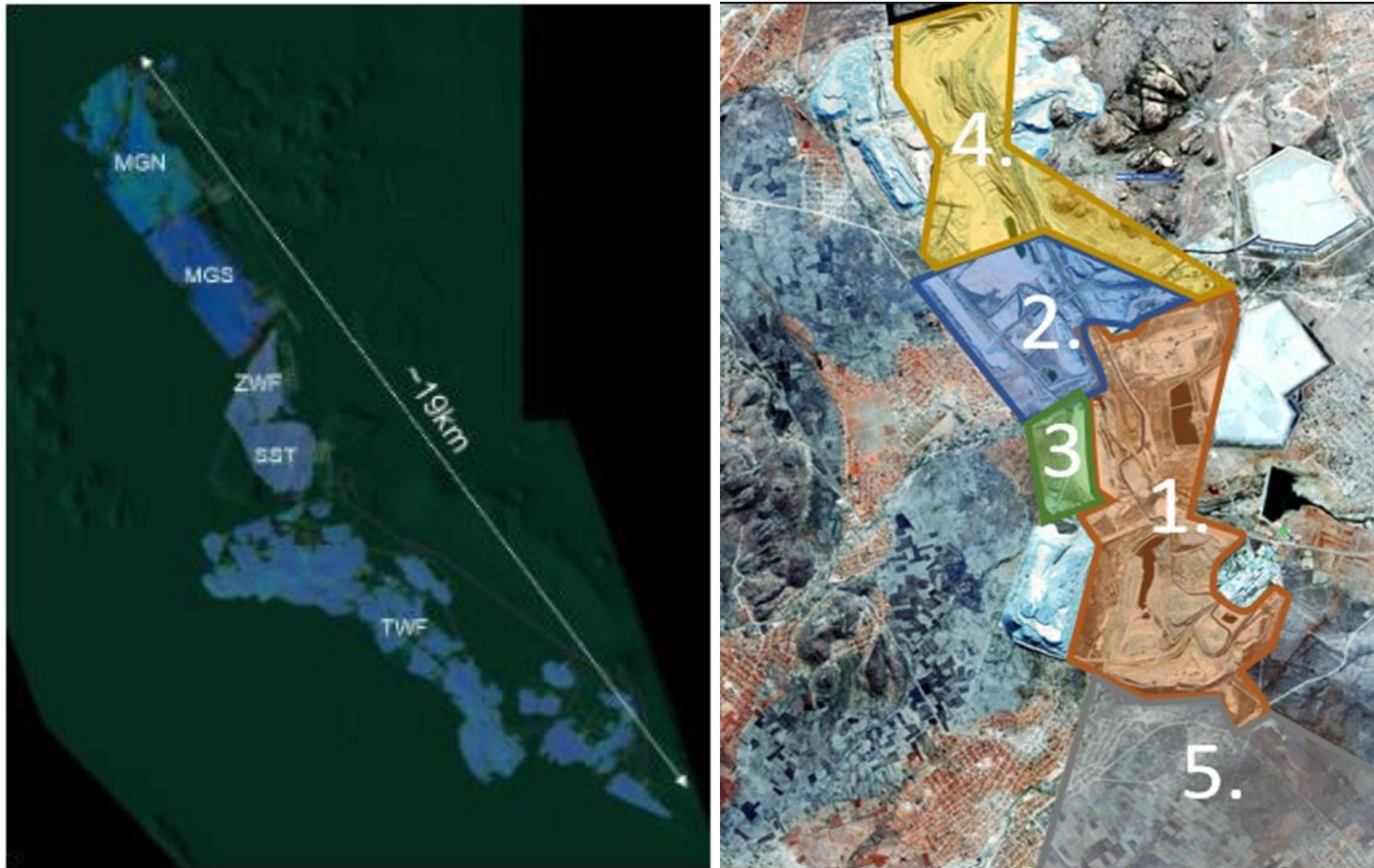


Figure 2: Layout of the Mogalakwena Mining Complex situated in the Limpopo Province of South Africa.





**Figure 3:** Underground mine development zones.



## 2 SPECIALIST CREDENTIALS

Mrs. Elize Butler completed this PIA. She has conducted approximately 300 palaeontological impact assessments for developments in the Free State, KwaZulu-Natal, Eastern, Central, and Northern Cape, Northwest, Gauteng, Limpopo, and Mpumalanga. She has an MSc (*cum laude*) in Zoology (specializing in Palaeontology) from the University of the Free State, South Africa and has been working in Palaeontology for more than twenty-eight years. She has experience in locating, collecting, and curating fossils, including exploration field trips in search of new localities in the Karoo Basin. She has been a member of the Palaeontological Society of South Africa (PSSA) since 2006 and has been conducting PIAs since 2014.

A curriculum vitae is included in Appendix 1 of this specialist input report.

## 3 TERMS OF REFERENCE

The terms of reference for the study are as follows:

- Provide an overview of the relevant legislative framework.
- Identify fossil heritage in the development area.
- Conduct a site investigation of the proposed development area (mine expansion).
- Identify possible impacts of the development on the palaeontological heritage of the area.
- Determine the Palaeontological Significance of the fossils identified in the development area.
- Propose mitigation measures minimizing negative impacts on the palaeontological heritage of the development area.

The present field-based study assesses the potential impacts on Fossil Heritage on the development. This study forms a part of the Heritage Impact Assessment Report. According to the "SAHRA APM Guidelines: Minimum Standards for the Archaeological and Palaeontological Components of Impact Assessment Reports" the purpose of the PIA is: 1) to identify the palaeontological importance of the rock formations in the footprint; 2) to evaluate the palaeontological magnitude of the formations; 3) to clarify the **impact** on fossil heritage; and 4) to suggest how the developer might protect and lessen possible damage to fossil heritage.

The palaeontological status of each rock section is calculated as well as the possible impact of the development on fossil heritage by a) the palaeontological importance of the rocks, b) the type of development and c) the quantity of bedrock removed.



All possible information is consulted to compile a scoping report, and this includes the following: Provisional DFFE Screening Tool, SAHRIS Palaeosensitivity map, all Palaeontological Impact Assessment reports in the same area; aerial photos and Google Earth images, topographical and geological maps as well as scientific articles of specimens from the development area and Assemblage Zones.

When the development footprint has a moderate to high palaeontological sensitivity a field-based assessment is necessary. The desktop and the field survey of the exposed rock determine the impact significance of the planned development and recommendations for further studies or mitigation are made. Destructive impacts on palaeontological heritage usually only occur during the construction phase while the excavations will change the current topography and destruct or permanently seal-in fossils at or below the ground surface. Fossil Heritage will then no longer be accessible for scientific research.

During a site investigation the palaeontologist does not only survey the development but also tries to determine the density and diversity of fossils in the development area. This is confirmed by examining representative exposures of fossiliferous rocks (sedimentary rocks contain fossil heritage whereas igneous and metamorphic rocks are mostly unfossiliferous). Rock exposures that are investigated usually contains a large portion of the stratigraphic unit, can be accessed easily and comprise of unweathered (fresh) exposed rock. These exposures may be natural (rocky outcrops in stream or river banks, cliffs, dongas) but could also be artificial (quarries, open building excavations and even railway and road cuttings). It is common practice for palaeontologist to log well-preserved fossils (GPS, and stratigraphic data) during field assessment studies.

Mitigation usually precedes construction or may occur during construction when potentially fossiliferous bedrock is exposed. Mitigation comprises the collection and recording of fossils. Preceding excavation of any fossils, a permit from SAHRA must be obtained and the material will have to be housed in a permitted institution. When mitigation is applied correctly, a positive impact is possible as knowledge of local palaeontological heritage may be increased.

The fossil potential of the development area was determined by criss-crossing the development footprint and by physically investigating the bedrock outcrops to determine the lithology and fossil content of the outcrops. Selected potentially fossiliferous sites (e.g., along drainage lines, hillslopes and erosion gullies) were specifically investigated. Fossils occurring at the surface is very unpredictable and a representative sample size of the area has been investigated. Fossil sites are usually discovered by chance and a representative subsample is all that can be hoped for. However, it is important to note that the absence of fossils in a development footprint does not necessarily mean that palaeontological significant material is not present on site (on or beneath ground surface).



### 3.1 Assumptions and Limitations

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

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

Access to the relevant farms was freely available and it was possible to investigate all areas deemed necessary for the satisfactory completion of the study.

#### 3.2 General Requirements of a PIA:

- 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.
  - 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).

#### 4 NATIONAL HERITAGE RESOURCES ACT (25 OF 1999)

Cultural Heritage in South Africa, includes all heritage resources, is protected by the National Heritage Resources Act, 1999 (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, 1998 (Act No. 107 of 1998) (NEMA)
- National Heritage Resources Act (Act No. 25 of 1999) (NHRA)
  - Protection of Heritage Resources – Sections 34 to 36
  - Heritage Resources Management – Section 38

The NEMA (Act 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”*.

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 is triggered through section 38 of the NHRA that can form part of the Heritage Impact Assessment (HIA) if it is required by SAHRA and adhere to the conditions of the Act. According to **Section 38 (1)**, SAHRA must be contacted to determine if an HIA or sub-studies (historical, palaeontological or archaeological) 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<sup>2</sup> 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 m<sup>2</sup> in extent.
- or any other category of development provided for in regulations by SAHRA or a Provincial heritage resources authority.

## 5 DESCRIPTION OF THE RECEIVING ENVIRONMEN

The geology of the proposed MC is indicated on the 1:250 000 Pietersburg 2328 (1985) and 2428 Nylstroom (1978) Geological Map (Council for Geosciences, Pretoria) (**Figure 4, Table 2-4**). The proposed mining development is underlain by rocks of the Rustenburg Layered Suite of the Bushveld Complex, Archaean Granitoid Intrusions as well as the Precambrian dolomites and associated marine sedimentary rocks of the Malmani Subgroup (Chuniespoort Group, Transvaal Supergroup). The PalaeoMap (**Figure 5**) on the South African Heritage Resources Information System database, indicates that the Palaeontological Sensitivity of the Bushveld Complex and Archaean Granitoid Intrusions is Zero as they are igneous in origin and thus unfossiliferous, while the Malmani Subgroup has a very high Palaeontological Sensitivity (Almond and Pether 2008, SAHRIS website). The geology has recently been updated (Council of Geosciences, Pretoria) and indicates that the proposed mining development is underlain by the Bushveld Complex, Archaean Granitoid Intrusions and Limpopo Belt as well as the Precambrian dolomites and associated marine sedimentary rocks of the Malmani Subgroup (Chuniespoort Group, Transvaal Supergroup) (**Figure 6**).

The Palaeotechnical report of the Limpopo Province (Groenewald et, 2014) indicates that Cave deposits may be present in the development footprint. The Makapansgat Valley World Heritage Site is world renowned for the palaeontological records of human evolution and is located within a 30km radius of the MC. It is thus probable that cave deposits are present near the ground surface in the karstic weathered outcrop area. The Archaeological Impact Assessment Report must be read in conjunction with this PIA as it will describe the evidence of human history in the development area, whereas the PIA focusses on the animal history. The Palaeontological Sensitivity of these Cave deposits is Very High. Quaternary cave deposits are not mapped on the geological maps (1:1million scale). The Very High Malmani Subgroup triggered a PIA site investigation.

The Bushveld Complex comprise of the largest mafic intrusion in the world and underlie an area of almost 65 000 km<sup>2</sup>. The maximum thickness of these rocks is almost 8 km while individual layers can be





followed for about 150 km. This intrusion is world renowned for the ore reserves of platinum-group elements namely chromium and vanadium. The Bushveld Complex is divided in 4 groups namely the Lebowa Granite Suite, Raseebie Granophyre Suite, Rustenburg Layered Suite and Rooiberg Group (**Table 6**). The latter Group of felsic and minor volcanic rocks may be genetically closer related to the Bushveld event as to the Transvaal Supergroup (Hutton and Schweitzer, 1995). The Rustenburg Layered Suite reveals a complete differentiation sequence of magma and is made up of various rock layers ranging from dunite, gabbro, norite, and pyroxenite, and anorthosite to magnetite and apatite- rich diorite.

The Hout River Gneiss Suite is present in the north-eastern Kaapvaal craton and contain granitoid gneisses with various compositions. This Gneiss consists of coarse-grained metamorphic rock that is typically banded and is formed by regional high-grade metamorphism of granite. Alkali feldspar, amphiboles mica, quartz, and rarely pyroxenes forms large crystals in this gneiss (Robb et al, 2006).

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.

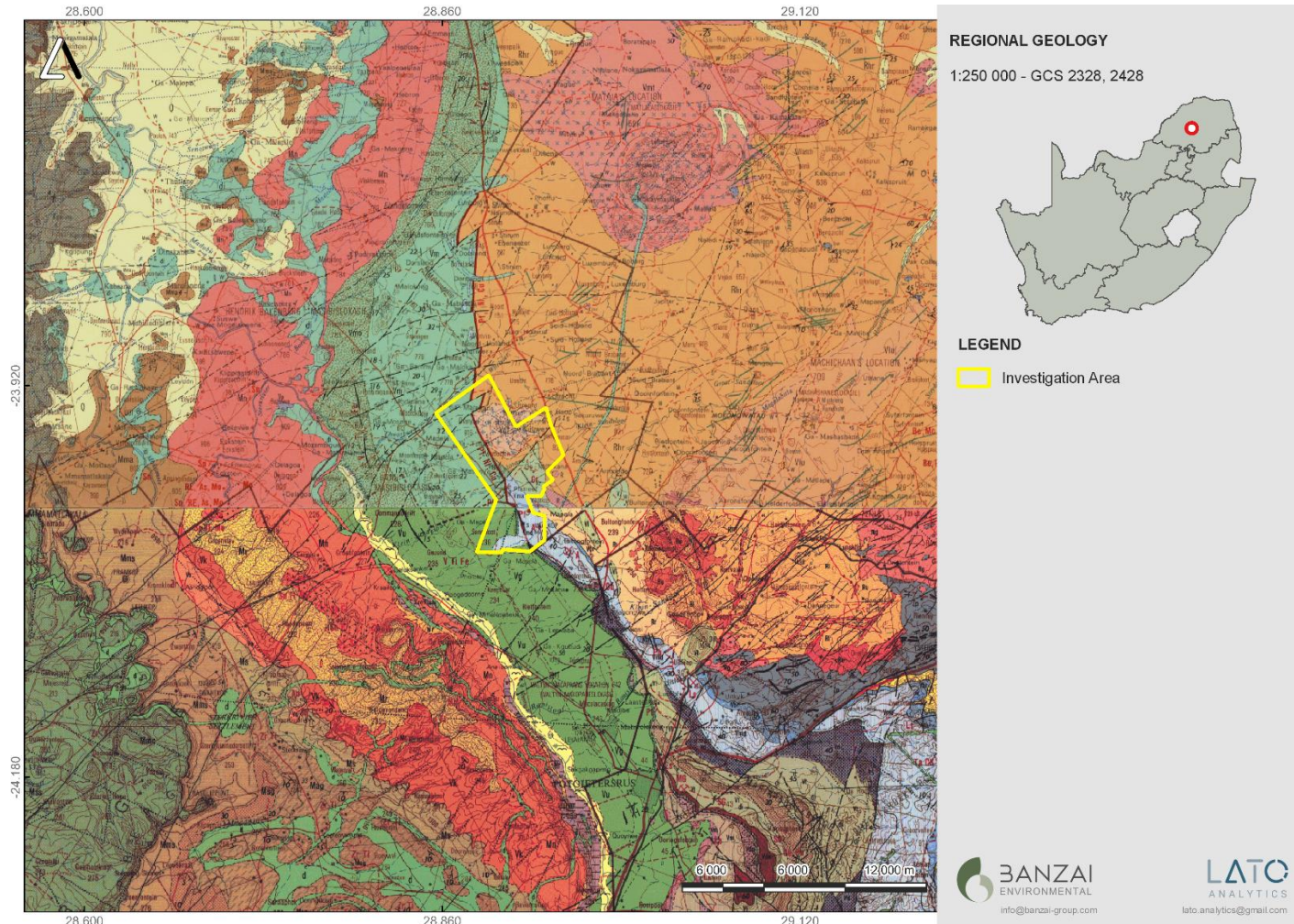
The southern portion of the MC is underlain by the Malmani Subgroup (Chuniespoort Group of the Transvaal Supergroup). The Malmani Subgroup carbonates of the Transvaal comprise of an assortment of stromatolites (microbial laminates), ranging from supratidal mats to intertidal columns and large subtidal domes (Eriksson *et al.* 2006). 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. These algae photosynthesised in the low oxygen atmosphere and deposited layer upon layer of calcium sulphate, magnesium sulphate and calcium carbonate as well as other compounds to form these domes. Researchers have examined and classified the stromatolite structures but seldomly find preserved algal cells. The oxygen atmosphere that we depend on today 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, 2001; Buick, 2001; and Schopf, 2006). The Malmani stromatolites literature includes articles by Truswell and Eriksson (1972, 1973, 1975), Eriksson and MacGregor (1981), Eriksson and Altermann (1998), Sumner (2000), Schopf (2006).



The Malmani Subgroup succession is about 2 km-thick and consists of a series of formations of oolitic and stromatolitic carbonates (limestones and dolomites), black carbonaceous shales and minor secondary cherts. The Malmani Dolomites also consist of historic lime mines, and palaeocave fossil deposits. Dolomite (limestone rock) forms in warm, shallow seas from slow gathering remainders of marine microorganisms and fine-grained sediment. Dolomites of the Malmani Subgroup has a higher magnesium content than other limestones. These materials contain high levels of calcium carbonate and are often referred to as *carbonates*.

Currently very few palaeontologists study stromatolites but geologists find the stromatolites interesting because they reveal the change from a reducing environment (that is an oxygen-poor) to an oxidizing environment (oxygen-rich). This transition is known as the Great Oxygen Event (Eroglu et al., 2017).



**Figure 4:** Extract of the 1:250 000 Pietersburg 2328 (1985) and 2428 Nylstroom (1978) Geological Maps (Council for Geosciences, Pretoria) indicating the Mogalakwena Mining Complex in Limpopo Province.

The proposed development is underlain by the Bushveld Complex, Archaean granitoid Intrusions as well as the Malmani Subgroup (Chuniespoort Group of the Transvaal Supergroup).

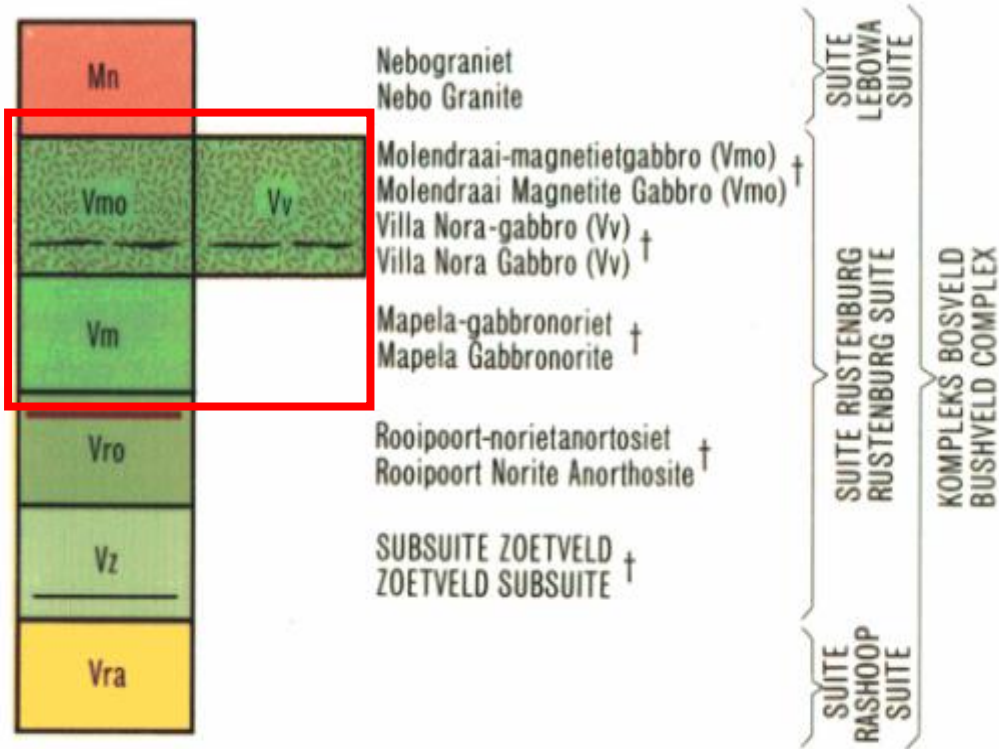




Table 2: Legend of the 1:250 000 Pietersburg 2328 (1985) Geological Map (Council for Geosciences, Pretoria).



alluvium; kalkkreet (---); puin (▲▲▲)  
 lluvium; calcrete (---); scree (▲▲▲)



Vmo Magnetietgabbro, gabbro, anortosiet, oliviendioriet; magnetietlaag (—)  
 Magnetite gabbro, gabbro, anorthosite, olivine diorite; magnetite layer (—)  
 Vm Gabbro, noriet, anortosiet, pirokseniet, harzburgiet, troktoliet  
 Gabbro, norite, anorthosite, pyroxenite, harzburgite, troctolite

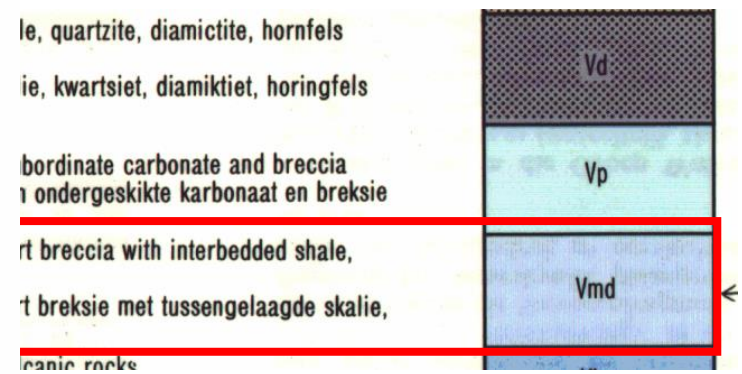
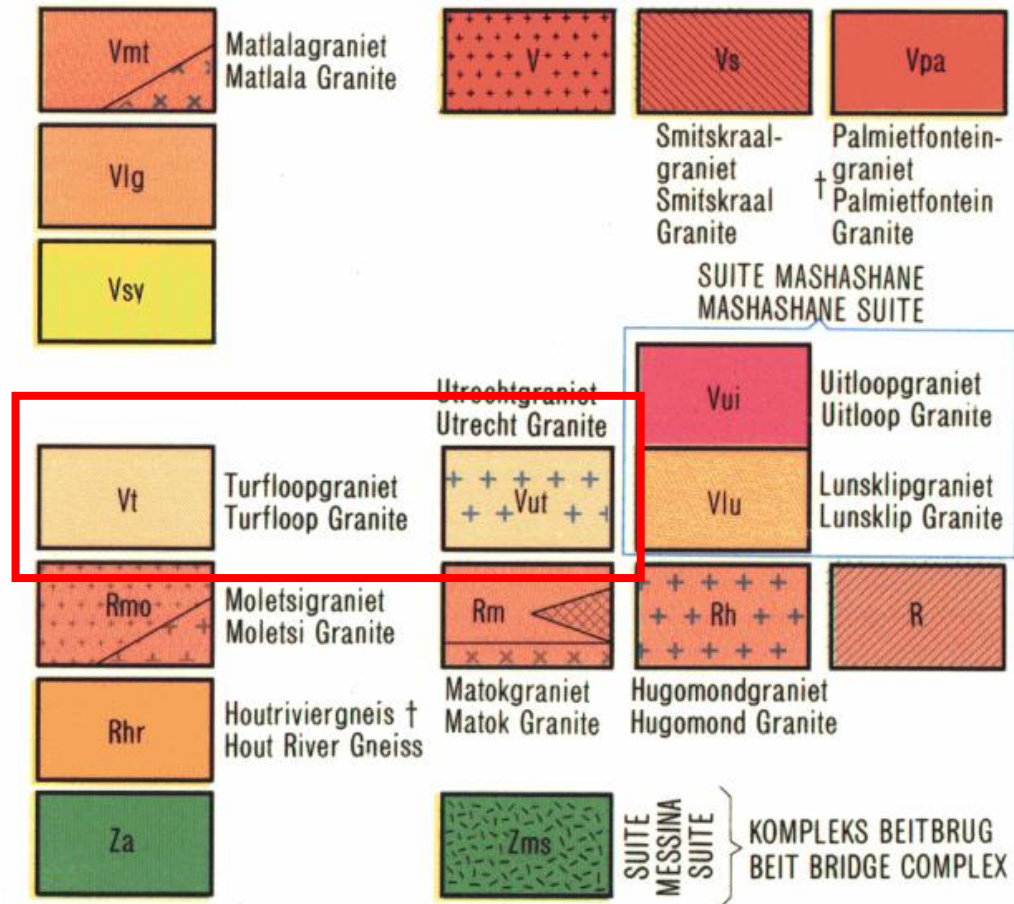
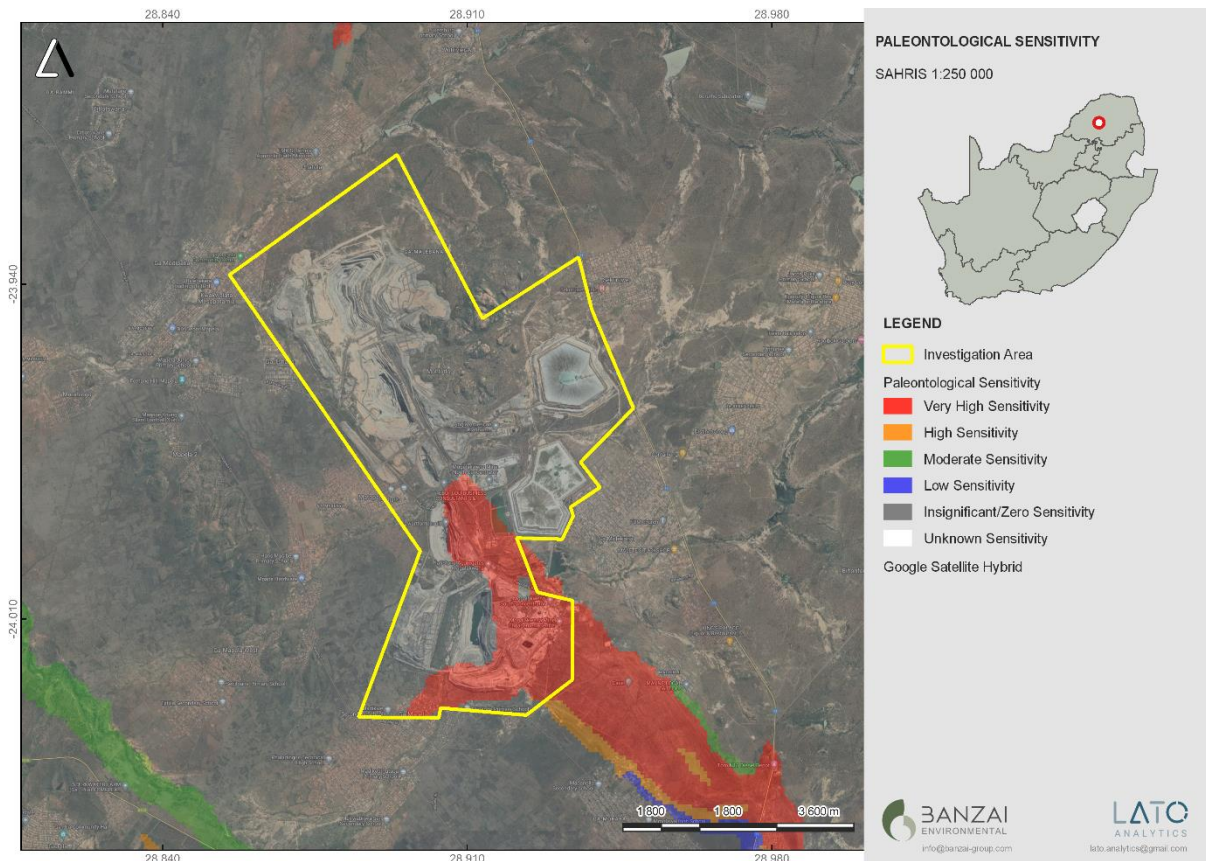




Table 4: Legend of the 1:250 000 Pietersburg 2328 (1985) Geological Map (Council for Geosciences, Pretoria) indicating the relevant geology present in the development





**Figure 5:** Extract of the 1: 250 000 SAHRIS PalaeoMap map (Council of Geosciences, Pretoria) indicating the Palaeontological Sensitivity of the Mogalakwena Mining Complex.

**Table 5:** Palaeontological Sensitivity according to the SAHRIS PalaeoMap (Almond et al, 2013; SAHRIS website)

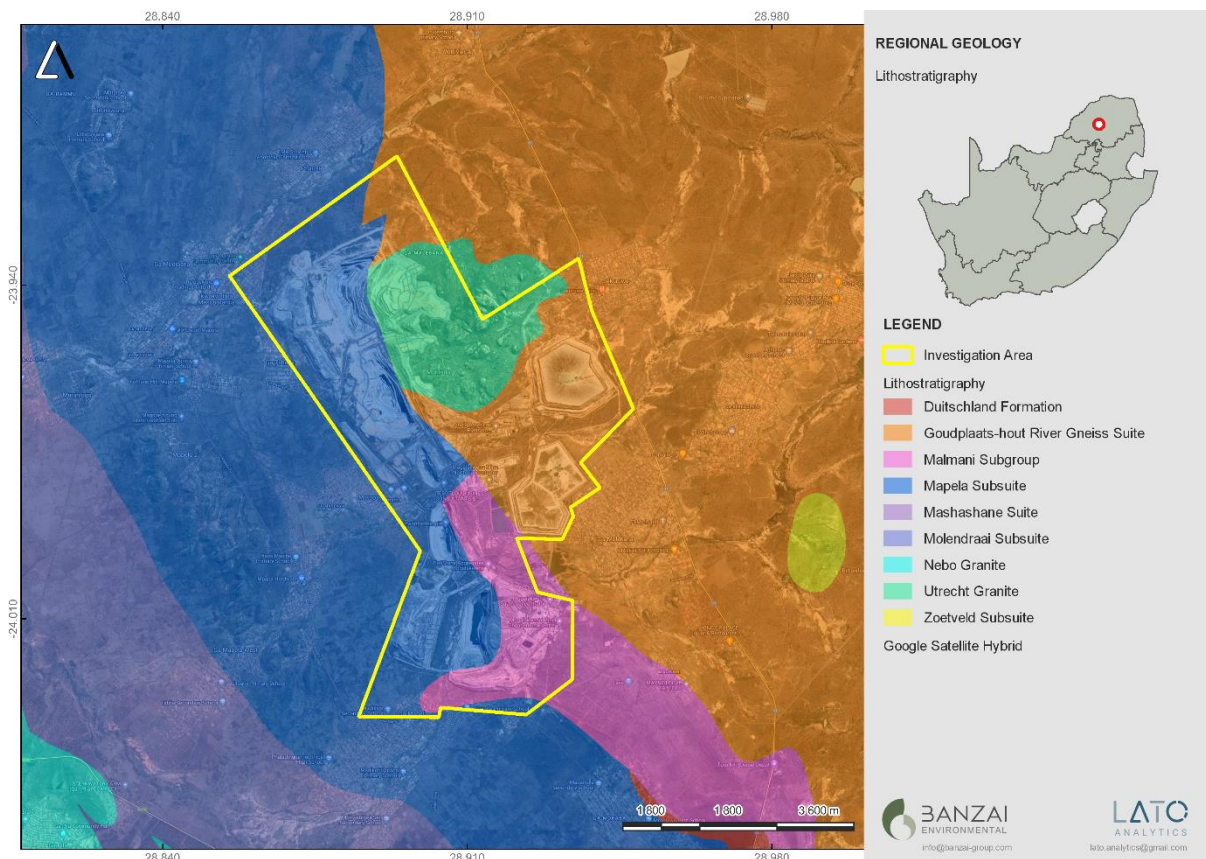
Colour	Sensitivity	Required Action
RED	VERY HIGH	Field assessment and protocol for finds is required
ORANGE/YELLOW	HIGH	Desktop study is required and based on the outcome of the desktop study; a field assessment is likely
GREEN	MODERATE	Desktop study is required



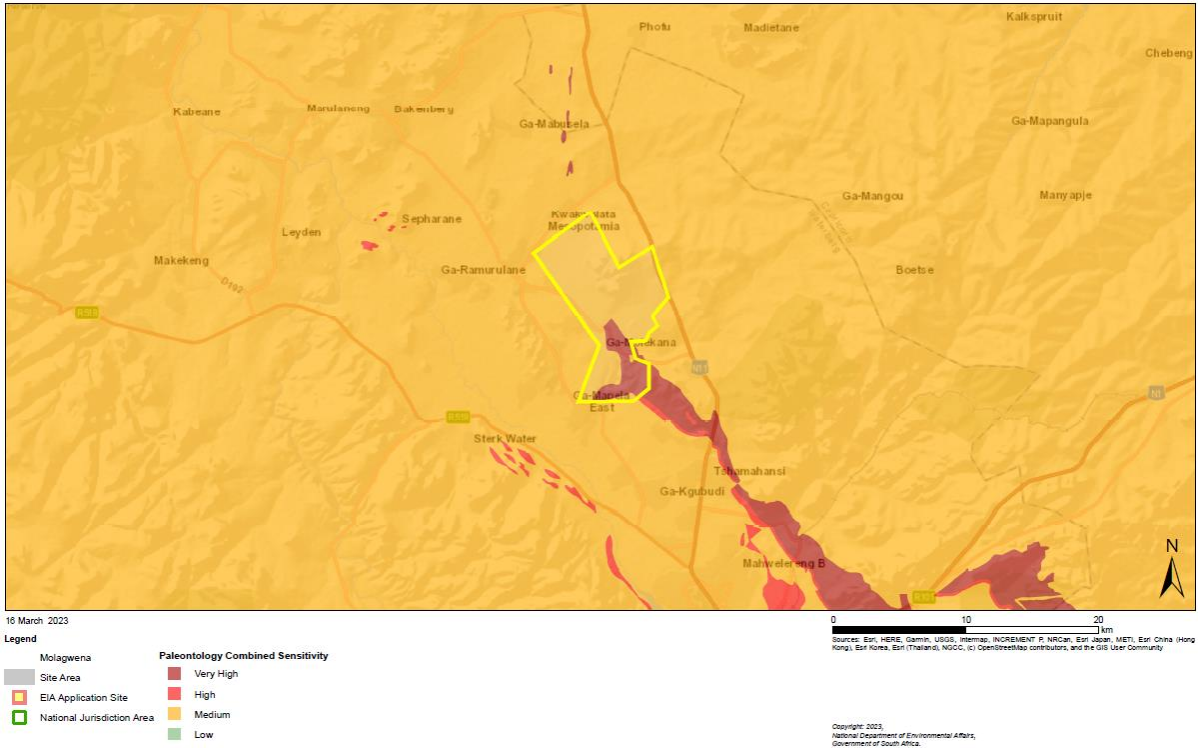


BLUE	LOW	No palaeontological studies are required however a protocol for finds is required
GREY	INSIGNIFICANT/ZERO	No palaeontological studies are required
WHITE/CLEAR	UNKNOWN	These areas will require a minimum of a desktop study. As more information comes to light, SAHRA will continue to populate the map.

According to the SAHRIS Palaeosensitivity map (Figure 5; Table 5) the proposed development is underlain by sediments with a Very High (red) and Zero (grey) Palaeontological Sensitivity.



**Figure 6:** Updated Geology (Council of Geosciences, Pretoria) of the Mogalakwena Mining Complex in Limpopo indicates that the development is underlain by the Bushveld complex, Archaean Granitoid Intrusions, Limpopo Belt Sediments, and the Malmani Subgroup (Chuniespoort Group, Transvaal Supergroup).



**Figure 7:** Palaeontological Sensitivity of the Mogalakwena Mining Complex generated by the National Environmental Web-bases Screening Tool indicating a Very High Palaeontological Sensitivity.



**Figure 8:** Example of Archean stromatolites





Table 6: Currently accepted nomenclature and subdivisions of the Bushveld Complex (Cawthorn et al, 2006)

Lebowa Granite Suite	Nebo, Makhutso, Klipkloof, Bobbejaanskop and Verena Granites
Rashoop Granophyre Suite	Stavoren and Diepkloof Granophyres, Rooikop Porphyritic Granite, Zwartbank Pseudogranophyre
Rustenburg Layered Suite	Upper Zone Subzone C (Ol-Ap diotite Subzone B (Ol-Mt gabbronorite) Subzone A (Mt gabbronorite)
	Main Zone Upper Upper Subzone (gabbronorite) Lower Subzone (gabbronorite, norite)
	Critical Zone Upper Subzone (norite, anorthosite, pyroxenite) Lower Subzone (pyroxenite) Lower Subzone (pyroxenite)
	Marginal Zone (norite)
Rooiberg Group	Schrikkloof Formation (flow-banded rhyolite) Kwaggasnek Formation (dacite, rhyolite)  Dullstroom Formation (basaltic andesite)



A site-specific field survey of the development footprint was conducted on foot and by motor vehicle on March 2023. The development has a low topography mantled by thick grass, and outcrops were not detected. The site visit concentrated on the areas underlain by the fossiliferous Malmani Subgroup.



**Figure 9:** View over the northern portion of the development indicates thick vegetation with no visible outcrop.



**Figure 10:** View from the north towards the mining development.



**Figure 11:** View from the eastern margin of the development





**Figure 12:** *Thick vegetation present in the central portion of the proposed underground mining development.*



**Figure 13:** View over the south eastern portion of the development underlain by sediments of the Malmani Subgroup.



## 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 Alta van Dyk Environmental.
- 1:250 000 Pietersburg 2328 (1985) Geological Map (Council for Geosciences, Pretoria) and
- 2428 Nylstroom (1978) Geological Map (Council for Geosciences, Pretoria)
- Updated Geology (2018) (obtained from the Council of Geosciences, Pretoria).
- Palaeotechnical Report of the Limpopo Province (Groenewald et al, 2014)
- Palaeosensitivity map on SAHRIS (South African Heritage Resources Information System) website
- Published geological and palaeontological literature as well as
- Relevant PIAs in the area
- A two day-comprehensive site-specific field survey of the development footprint for the combined projects was conducted on foot and motor vehicle in March 2023.



## 7 ASSESSMET OF IMPACTS






Table 7: The rating system

POTENTIAL ENVIRONMENTAL IMPACT	ACTIVITY	ENVIRONMENTAL SIGNIFICANCE BEFORE								CUMULATIVE	STATUS	RECOMMENDED MITIGATION MEASURES /	ENVIRONMENTAL SIGNIFICANCE AFTER							
		M	D	S	I	R	P	TOTAL	SS				M	D	S	I	R	P	TOTAL	SS
<b>Heritage /PaleResources</b>																				
Loss of fossil heritage	Activities associated with mining	6	2	1	5	5	3	57		Medium	Positive	Should fossils be unearthed the Contrcator shall notify the Provincial Heritage Resouce Agency	2	2	1	5	5	1	15	





**Colour codes to use per scoping block**

VH	H	MH	M	L
125-150	100-124	75-99	40-74	<40
				



## 8 FINDINGS AND RECOMMENDATIONS

The proposed mining development is underlain by rocks of the Bushveld Complex, Archaean Granitoid Intrusions as well as the Malmani Subgroup (Chuniespoort Group of the Transvaal Supergroup

According to the PalaeoMap on the South African Heritage Resources Information System (SAHRIS) database, the Palaeontological Sensitivity of the Bushveld Complex and Archaean Granitoid Intrusions is Zero as they are igneous in origin and thus unfossiliferous, while the Malmani Subgroup has a Very High Palaeontological Sensitivity (Almond and Pether 2008, SAHRIS website). The Malmani Subgroup is known for stromatolitic carbonates with a range of marine to intertidal stromatolites and organic walled microfossils.

The Palaeotechnical report of the Limpopo Province (Groenewald et, 2014) indicates that Cave deposits may be present in the development footprint. As the Makapansgat Valley World Heritage Site is located within a 30km radius of the MC and it is probable that cave deposits are present near the ground surface in the karstic weathered outcrop area. The Palaeontological Sensitivity of these Cave deposits is Very High. Quaternary cave deposits are not mapped on the geological maps (1:1million scale). The Very High Palaeontological Sensitivity of the Cave deposits and Malmani Subgroup triggered a site investigation.

A site-specific field survey of the development footprint was conducted on foot and by motor vehicle in March 2023. **No fossiliferous outcrops and no karstic weathered outcrop areas were detected in the proposed development area.** The rarity of fossil heritage in the proposed development footprint suggests that the impact of the development will be of a Low significance in palaeontological terms. It is therefore considered that the proposed development is deemed appropriate and feasible and will not lead to damaging impacts on the palaeontological resources of the area. The construction of the development may thus be permitted in its whole extent, as the development footprint is not considered sensitive in terms of palaeontological resources.

However, if fossil remains are discovered during any phase of construction, either on the surface or exposed by excavations, the attached Chance Find Protocol must be implemented by the ECO/site manager in charge of these developments. This Palaeontological Chance find Protocol can be read in conjunction with the existing Chance find Protocol of the MMC. As the Chance of finding fossils in the mining area is LOW a monitoring process is not included.

These discoveries ought to be protected (if possible, *in situ*) and the ECO/site manager must report to South African Heritage Resources 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](http://www.sahra.org.za)) so that mitigation (recording and collection) can be carry out by a paleontologist.



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

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## 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  
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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 National Museum, Bloemfontein  
and Collection Manager 1998–2022





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## Appendix B

### CHANCE FINDS PROTOCOL (PALAEOLOGY)

#### Legislation

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

Palaeontological heritage is unique and non-renewable and is protected by the NHRA and are the property of the State. It is thus the responsibility of the State to manage and conserve fossils on behalf of the citizens of South Africa. Palaeontological resources may not be excavated, broken, moved, or destroyed by any development without prior assessment and without a permit from the relevant heritage resources authority as per section 35 of the NHRA.

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

#### 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](http://www.sahra.org.za). The information to the Heritage Agency must include photographs of the find, from various angles, as well as the GPS co-ordinates.
- A preliminary report must be submitted to the Heritage Agency within **24 hours** of the find and must include the following: 1) date of the find; 2) a description of the discovery and a 3) description of the fossil and its context (depth and position of the fossil), GPS co-ordinates.



- Photographs (the more the better) of the discovery must be of high quality, in focus, accompanied by a scale. It is also important to have photographs of the vertical section (side) where the fossil was found.
- Upon receipt of the preliminary report, the Heritage Agency will inform the ESO (or site manager) whether a rescue excavation or rescue collection by a palaeontologist is necessary.
- The site must be secured to protect it from any further damage. **No attempt** should be made to remove material from their environment. The exposed finds must be stabilized and covered by a plastic sheet or sand bags. The Heritage agency will also be able to advise on the most suitable method of protection of the find.
- If the fossil cannot be stabilized the fossil may be collected with extreme care by the ESO. Fossils finds must be stored in tissue paper and in an appropriate box while due care must be taken to remove all fossil material from the rescue site.
- Once the Heritage Agency has issued the written authorization, the developer may continue with the development on the affected area.



## Examples of possible fossil finds

As mentioned in the report there are a possibility (albeit LOW) of finding stromatolites in the mining area. Here is an example of two stromatolites photographed by the author during field work.



Image of Archean Stromatolites



## Caenozoic fossils

Fossils found near the MMC

The following images were obtained from:

Clarke, Ronald. (2008). Latest information on Sterkfontein's Australopithecus skeleton and a new look at Australopithecus. South African Journal of Science. 104. 443-449. 10.1590/S0038-23532008000600015.



Fig. 5. Thick flowstone (A–B) that seals in skeleton on top of talus. The central part of flowstone has been excavated away. C, Left hand and D forearm; E, left humerus and skull.

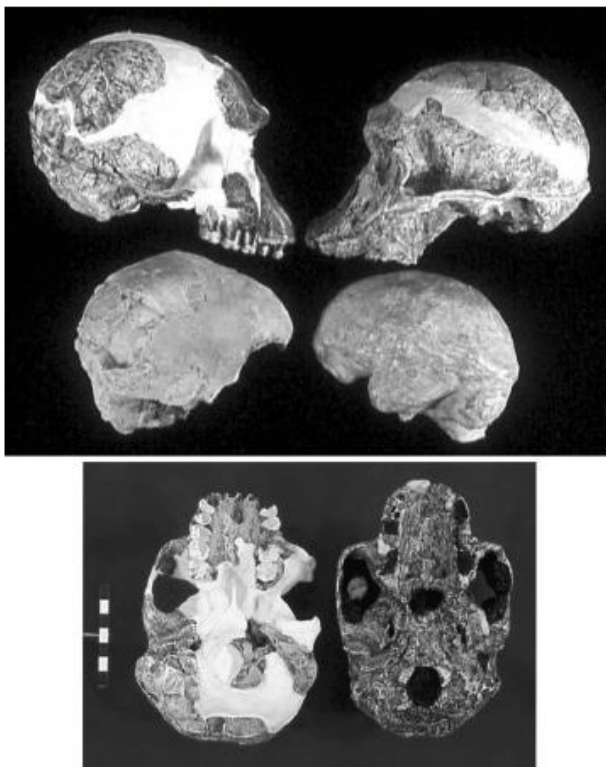


Fig. 6. Clarke reconstruction of StW 53 male *Australopithecus africanus* (top left) compared to Sts 5 female *A. africanus* cast (top right), endocranial casts of StW 53 (middle row left) and Sts 5 (middle row right), basal view of StW 53 Clarke reconstruction (lower left) and Sts 5 cast (lower right). Note broader cranial base in the male StW 53.



Appendix C

Impact Assessment Methodology

Evaluation Component	Rating	Scale	Description / criteria
<b>MAGNITUDE of negative impact</b> (at the indicated spatial scale)	10	Very high	Bio-physical and/or social functions and/or processes might be <i>severely</i> altered.
	8	High	Bio-physical and/or social functions and/or processes might be <i>considerably</i> altered.
	6	Medium	Bio-physical and/or social functions and/or processes might be <i>notably</i> altered.
	4	Low	Bio-physical and/or social functions and/or processes might be <i>slightly</i> altered.
	2	Very low	Bio-physical and/or social functions and/or processes might be <i>negligibly</i> altered.
	0	Zero	Bio-physical and/or social functions and/or processes will remain <i>unaltered</i> .
<b>MAGNITUDE of POSITIVE IMPACT</b> (at the indicated spatial scale)	10	Very high	Positive: Bio-physical and/or social functions and/or processes might be <i>substantially</i> enhanced.
	8	High	<b>Positive:</b> Bio-physical and/or social functions and/or processes might be <i>considerably</i> enhanced.
	6	Medium	<b>Positive:</b> Bio-physical and/or social functions and/or processes might be <i>notably</i> enhanced.
	4	Low	<b>Positive:</b> Bio-physical and/or social functions and/or processes might be <i>slightly</i> enhanced.
	2	Very low	<b>Positive:</b> Bio-physical and/or social functions and/or processes might be <i>negligibly</i> enhanced.
	0	Zero	<b>Positive:</b> Bio-physical and/or social functions and/or processes will remain <i>unaltered</i> .
<b>DURATION</b>	5	Permanent	<b>Impact in perpetuity. –</b>
	4	Long term	Impact ceases after operational phase/life of the activity > 60 years.
	3	Medium term	Impact might occur during the operational phase/life of the activity – 60 years.
	2	Short term	Impact might occur during the construction phase - < 3 years.
	1	Immediate	<b>Instant impact.</b>
<b>EXTENT</b> (or spatial scale/influence of impact)	5	International	<b>Beyond the National boundaries.</b>
	4	National	Beyond provincial boundaries, but within National boundaries.
	3	Regional	Beyond 5 km of the mine area and within the provincial boundaries.
	2	Local	Within a 5 km radius of the mine area.
	1	Site-specific	<b>On site or within 100 meters of the site boundaries.</b>
	0	None	<b>Zero extent.</b>
<b>IRREPLACEABLE</b> loss of resources	5	Definite	<b>Definite</b> loss of irreplaceable resources.
	4	High potential	<b>High potential</b> for loss of irreplaceable resources.
	3	Moderate potential	<b>Moderate potential</b> for loss of irreplaceable resources.
	2	Low potential	<b>Low potential</b> for loss of irreplaceable resources.
	1	Very low potential	<b>Very low potential</b> for loss of irreplaceable resources.
	0	None	<b>Zero potential.</b>
<b>REVERSIBILITY</b> of impact	5	Irreversible	Impact <b>cannot</b> be reversed.
	4	Low irreversibility	<b>Low potential</b> that impact might be reversed.
	3	Moderate reversibility	<b>Moderate potential</b> that impact might be reversed.
	2	High reversibility	<b>High potential</b> that impact might be reversed.
	1	Reversible	Impact <b>will be</b> reversible.
	0	No impact	No impact.
<b>PROBABILITY</b> (of occurrence)	5	Definite	>95% chance of the potential impact occurring.
	4	High probability	75% - 95% chance of the potential impact occurring.
	3	Medium probability	25% - 75% chance of the potential impact occurring.
	2	Low probability	5% - 25% chance of the potential impact occurring.
	1	Improbable	<5% chance of the potential impact occurring.
	0	No probability	<b>Zero probability.</b>
<b>Evaluation Component</b>	<b>Rating scale and description / criteria</b>		
<b>CUMULATIVE</b> impacts	<p><b>High:</b> The activity is one of several similar past, present or future activities in the same geographical area, and might contribute to a very significant combined impact on the natural, cultural, and/or socio-economic resources of local, regional or national concern.</p> <p><b>Medium:</b> The activity is one of a few similar past, present or future activities in the same geographical area, and might have a combined impact of moderate significance on the natural, cultural, and/or socio-economic resources of local, regional or national concern.</p> <p><b>Low:</b> The activity is localised and might have a negligible cumulative impact.</p> <p><b>None:</b> No cumulative impact on the environment.</p>		