

**Palaeontological Impact Assessment for the
proposed MR on a portion of Duncan Farm, west
of Warrenton,
Northern Cape Province**

Desktop Study (Phase 1)

For

Batho Pele Co-Op

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Expertise of Specialist

The Palaeontologist Consultant: Prof Marion Bamford
Qualifications: PhD (Wits Univ, 1990); FRSSAf, mASSAf
Experience: 34 years research and lecturing in Palaeontology
26 years PIA studies and over 350 projects completed

Declaration of Independence

This report has been compiled by Professor Marion Bamford, of the University of the Witwatersrand, sub-contracted by Abenicia Henderson, 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

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

Signature:

Executive Summary

A Palaeontological Impact Assessment was requested for the proposed prospecting and mining right application for a portion of Farm Duncan, approximately 20 km west of the town of Warrenton, Northern Cape Province.

To comply with the regulations of the South African Heritage Resources Agency (SAHRA) in terms of Section 38(8) of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) (NHRA), a desktop Palaeontological Impact Assessment (PIA) was completed for the proposed development.

The proposed site lies on the highly fossiliferous Quaternary aeolian sands that might preserve transported and fragmentary fossils or vertebrate bones or silicified wood, although none has been reported from this area. Therefore, a Fossil Chance Find Protocol should be added to the EMPr. Based on this information it is recommended that no further palaeontological impact assessment is required unless fossils are found by the contractor, environmental officer or other designated responsible person once excavations, drilling or mining activities have commenced. Since the impact will be low, as far as the palaeontology is concerned, the project should be authorised.

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1. Background

A Palaeontological Impact Assessment was requested for the application for a prospecting and/or mining right on a Portion of the Farm Duncan, approximately 20 km west of the town of Warrenton, Northern Cape Province. JM Diamonds cc has submitted an application for a Prospecting Right (PR) to the Department of Mineral Resources and Energy (DMRE) in terms of Section 16 of the Mineral and Petroleum Resources Development Act, 2002 (MPRDA).

The relatively small area is along a tributary that flows northwest towards a larger river in the Vaal-Harts scheme (Figures 1-2).

A Palaeontological Impact Assessment was requested for the Duncan Farm project. To comply with the regulations of the South African Heritage Resources Agency (SAHRA) in terms of Section 38(8) of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) (NHRA), a desktop Palaeontological Impact Assessment (PIA) was completed for the proposed development and is reported herein.

Table 1: National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) and Environmental Impact Assessment (EIA) Regulations, 2014 (as amended) - Requirements for Specialist Reports (Appendix 6).

	A specialist report prepared in terms of the Environmental Impact Regulations of 2017 must contain:	Relevant section in report
ai	Details of the specialist who prepared the report,	Appendix B
a ii	The expertise of that person to compile a specialist report including a curriculum vitae	Appendix B
b	A declaration that the person is independent in a form as may be specified by the competent authority	Page 1
c	An indication of the scope of, and the purpose for which, the report was prepared	Section 1
ci	An indication of the quality and age of the base data used for the specialist report: SAHRIS palaeosensitivity map accessed – date of this report	Yes
cii	A description of existing impacts on the site, cumulative impacts of the proposed development and levels of acceptable change	Section 5
d	The date and season of the site investigation and the relevance of the season to the outcome of the assessment	N/A
e	A description of the methodology adopted in preparing the report or carrying out the specialised process	Section 2
f	The specific identified sensitivity of the site related to the activity and its associated structures and infrastructure	Section 4

	A specialist report prepared in terms of the Environmental Impact Regulations of 2017 must contain:	Relevant section in report
g	An identification of any areas to be avoided, including buffers	N/A
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;	N/A
i	A description of any assumptions made and any uncertainties or gaps in knowledge;	Section 5
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 4
k	Any mitigation measures for inclusion in the EMPr	Section 8, Appendix A
l	Any conditions for inclusion in the environmental authorisation	N/A
m	Any monitoring requirements for inclusion in the EMPr or environmental authorisation	Section 8, Appendix A
ni	A reasoned opinion as to whether the proposed activity or portions thereof should be authorised	Section 6
nii	If the opinion is that the proposed activity 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	Sections 6, 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 of 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 gazetted 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.	N/A

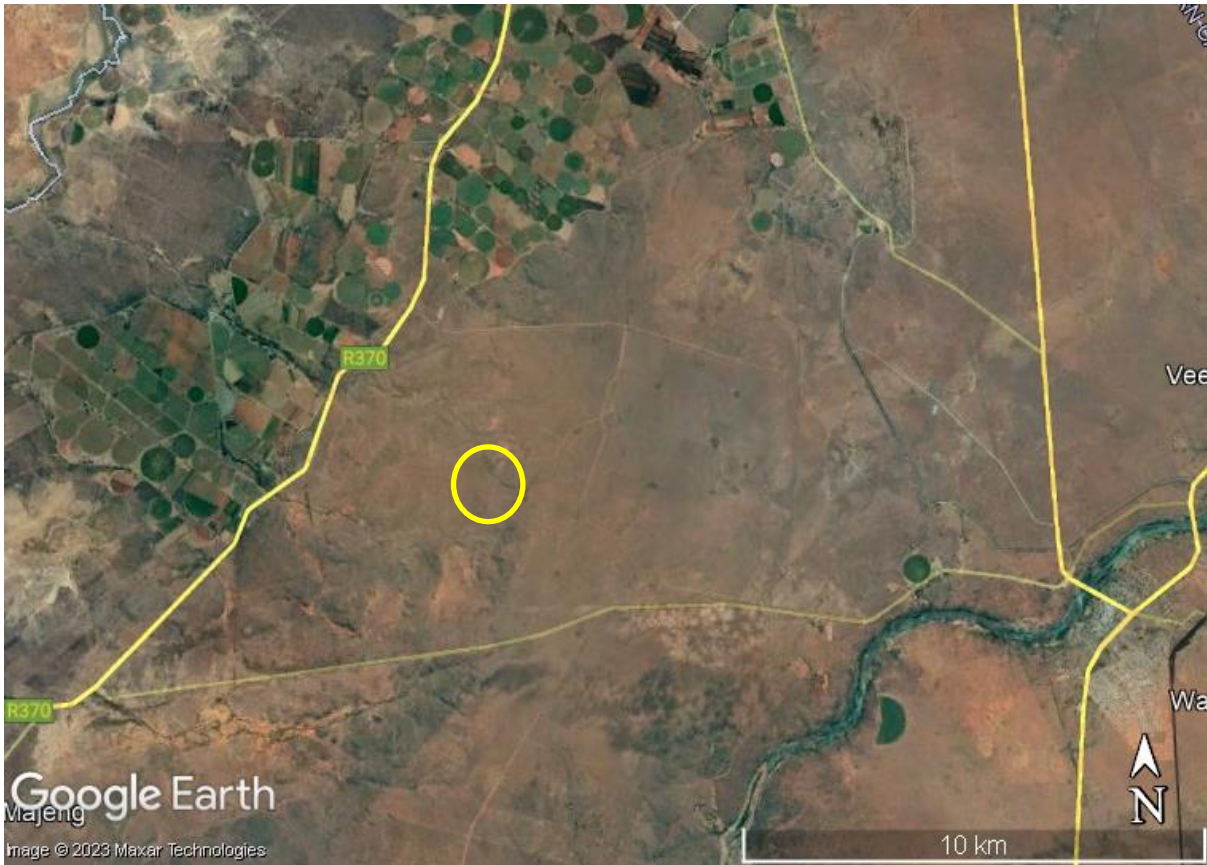


Figure 1: Google Earth map of the general area to show the relative landmarks. The Duncan Farm PR/MR area is shown by the yellow outline.

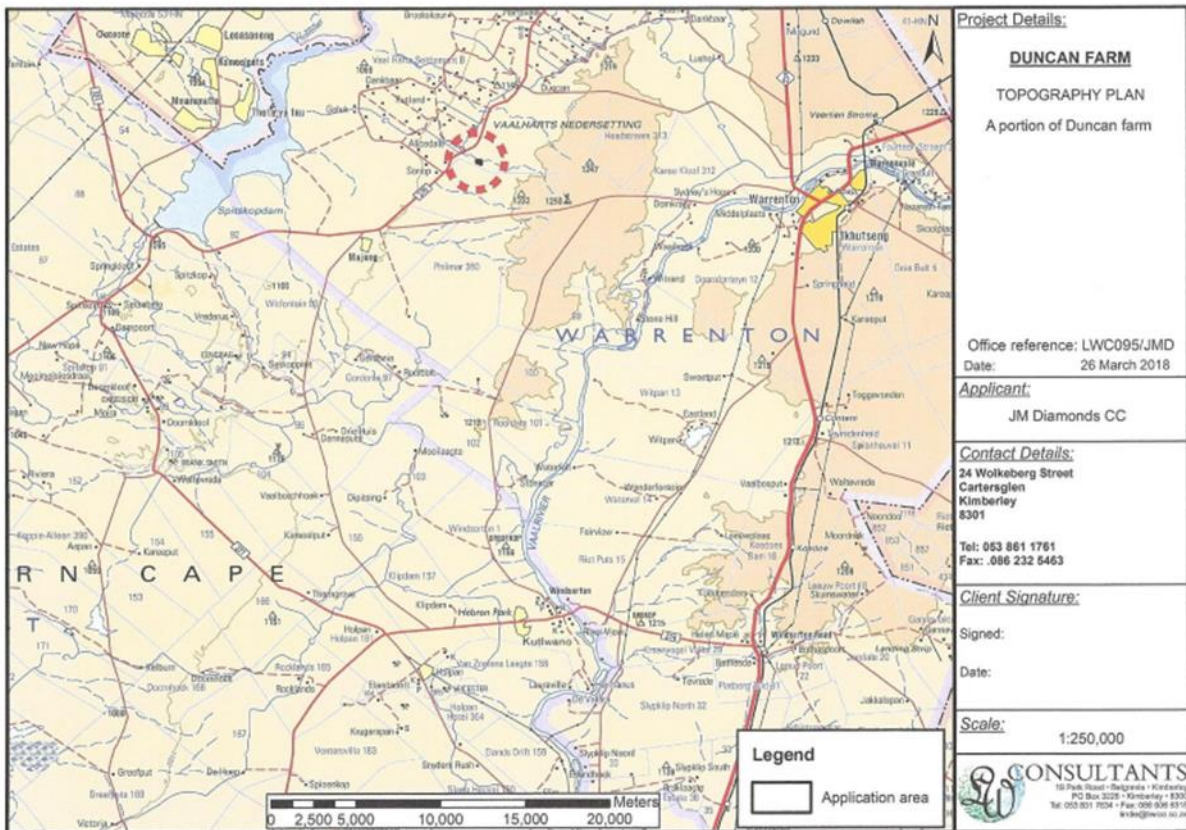


Figure 2: Locality Map of the proposed PR/MR on a portion of Farm Duncan shown within the red dots. Map supplied by LW Consultants.

2. Methods and Terms of Reference

The Terms of Reference (ToR) for this study were to undertake a PIA and provide feasible management measures to comply with the requirements of SAHRA.

The methods employed to address the ToR included:

1. Consultation of geological maps, literature, palaeontological databases, published and unpublished records to determine the likelihood of fossils occurring in the affected areas. Sources include records housed at the Evolutionary Studies Institute at the University of the Witwatersrand and SAHRA databases;
2. Where necessary, site visits by a qualified palaeontologist to locate any fossils and assess their importance (*not applicable to this assessment*);
3. Where appropriate, collection of unique or rare fossils with the necessary permits for storage and curation at an appropriate facility (*not applicable to this assessment*); and
4. Determination of fossils' representivity or scientific importance to decide if the fossils can be destroyed or a representative sample collected (*not applicable to this assessment*).

3. Geology and Palaeontology

i. Project location and geological context

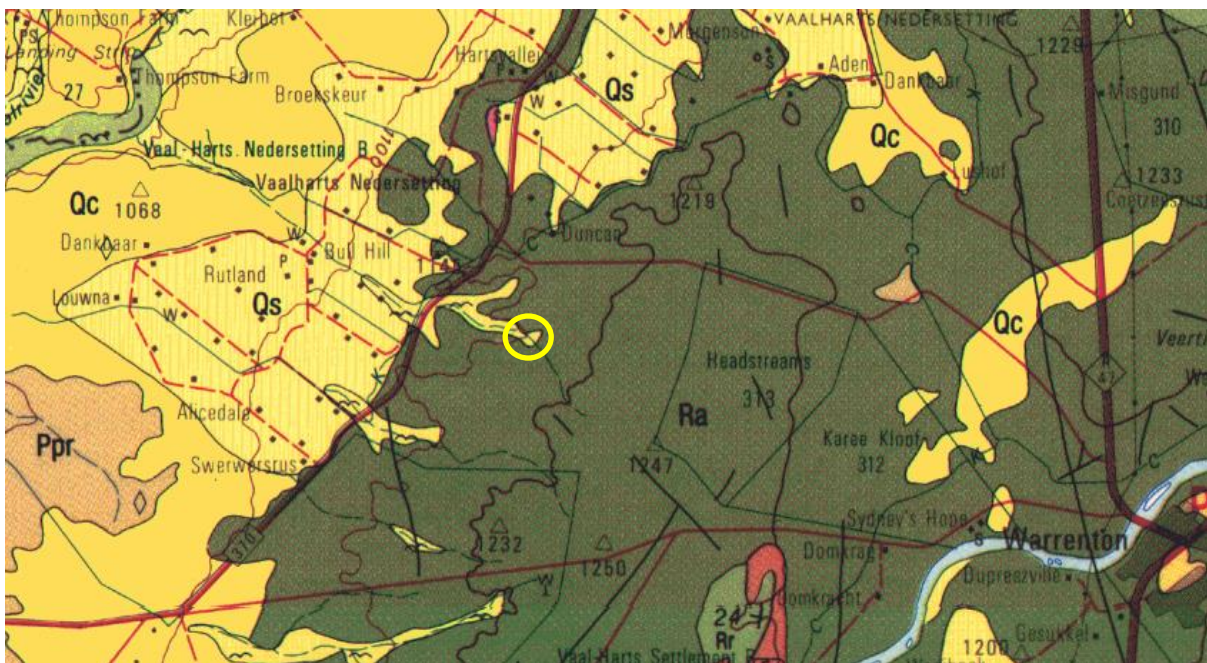


Figure 3: Geological map of the area around the Farm Duncan. The location of the proposed project is indicated within the yellow circle. Abbreviations of the rock types are explained in Table 2. Map enlarged from the Geological Survey 1: 250 000 map 2722 Kuruman.

Table 2: Explanation of symbols for the geological map and approximate ages (Eriksson et al., 2006; Johnson et al., 2006; McCarthy et al., 2006; Robb et al., 2006; van der Westhuizen et al., 2006). SG = Supergroup; Fm = Formation; Ma = million years; grey shading = formations impacted by the project.

Symbol	Group/Formation	Lithology	Approximate Age
Qc	Quaternary	Alluvium, sand, calcrete	Quaternary ca 1.0 Ma to Present
Qs	Jurassic dykes	Dolerite dykes, intrusive	Jurassic, Ca 183. 180 Ma
Ppr	Prince Albert Fm, Ecca Group, Karoo SG	Shales, sandstone, mudstone	Early Permian Ca 270-270 Ma
Ra	Allanridge Fm, Pniel Group, Ventersdorp SG	Mafic lava, tuff; amygdaloidal at base	2664 – 2654 Ma
Rk	Klipriviersberg Group, Ventersdorp SG	Andesite, tuff	Ca 2714 Ma

The project lies in the northwestern part of South Africa where a mantle of Quaternary sands overlies the older African surface comprising the resistant volcanic of the Ventersdorp Supergroup and the Cretaceous-Cenozoic surface (Figure 3).

According to de Wit (1999) and Partridge et al., (2006) the history of post-Gondwana major rivers in the western part of South Africa is very important because these rivers were instrumental in the establishment of diamondiferous placers along the west coast of southern Africa. The evolution of the drainage system that developed after breakup of west Gondwana can be viewed in three timeslots: the middle to Late Cretaceous, the early to middle Cenozoic, and the late Cenozoic periods.

During the middle to Late Cretaceous there were two main river systems, the southern Karoo River, and the northern Kalahari River that was closer to the present day Orange River. Erosion by the palaeo rivers released most of the diamonds from the Cretaceous kimberlites in central South Africa at different times and they were transported by the Karoo River to the coast initially, and the Kalahari River later.

By early Cenozoic times, the lower Kalahari River had captured the upper part of the Karoo River and the present Orange River network was established. During the early and middle Cenozoic, the climate was arid to semiarid so there was much less erosion and transport of sediments, including diamonds, at the time.

Late Cenozoic fluvial gravels, however, contain diamonds that were reworked out of older Tertiary fluvial deposits of the Koa Valley and Sak River thus reworked diamonds were trapped in the Cretaceous Karoo River deposits or terraces. Although climatic changes were the major controls that initiated the alluvial pulses during the Cenozoic, asymmetric uplift of the subcontinent was ultimately responsible for the northwesterly shift of the Orange River.

There were two large basins dominating southern Africa during the Cenozoic, with the Kalahari Basin to the west and the Bushveld basin to the east. Both basins are bounded along their southern extent by the more or less west-east trending Griqualand-Transvaal

Axis (Partridge et al., 2006). These sediments are not easy to date but recent attempts are gradually filling in the history of the sands, sand dunes and inter-dunes (Botha, 2021).

Quaternary Kalahari sands cover large parts of the rocks in this region, especially to the west. This is the largest and most extensive palaeo-erg in the world (Partridge et al., 2006) and is composed of extensive aeolian and fluvial sands, sand dunes, calcrete, scree and colluvium. Periods of aridity have overprinted the sands, and calcrete and silcrete are common. Most geological maps indicate these sands simply descriptively (aeolian sand, gravelly sand, calcrete) or they are lumped together as the Gordonia Formation because the detailed regional lithostratigraphic work has not been done. Nonetheless, these sands have eroded from the interior and have been transported by wind or water to fill the basin. Reworking of the sands or stabilisation by vegetation has occurred. Probable ages of dune formation are around 100 kya (thousand years), 60 kya, 27-23 kya and 17-10 kya (in Botha, 2021).

Along many of the rivers and watercourses are fluviially-transported sands and gravels that too are difficult to date. This sand is derived from the meandering channels and terraces and has been reworked in the past from rivers and re-captured rivers as the tectonic uplift has changed drainage patterns (de Wit, 1999; Botha, 2021). Human activities have also impacted the rivers and their sediment source.

ii. Palaeontological context

The palaeontological sensitivity of the area under consideration is presented in Figure 4. The site for prospecting/mining is in the highly sensitive Quaternary calcretes (orange). Along with diamonds, these cemented sands may also have trapped the more robust fossils, such as bone or silicified wood. These fossils would be fragmented and transported, so out of primary context, but such occurrences have been useful for determining the source of the rivers, their direction of flow, and the ages of rivers (de Wit and Bamford, 1993; de Wit et al., 2009). Some abandoned fluvial channels or palaeo-channels contain diamonds that have been transported from the source kimberlites, as well as fossil wood. Examples are from the palaeo-Sak River (Bamford and de Wit, 1993) that represent the palaeo-Karoo River, and along the palaeo-channels adjacent to the present day Orange River at Auchas (Pickford et al., 1996; Bamford, 2000).

The rocks of the Ventersdorp Supergroup are volcanic in origin (van der Westhuizen et al., 2006) and volcanic rocks do not preserve fossils.

The SAHRIS palaeosensitivity map (Figure 4) shows the Allanridge Formation as having a low sensitivity (blue) and the Quaternary calcretes as highly sensitive (orange).

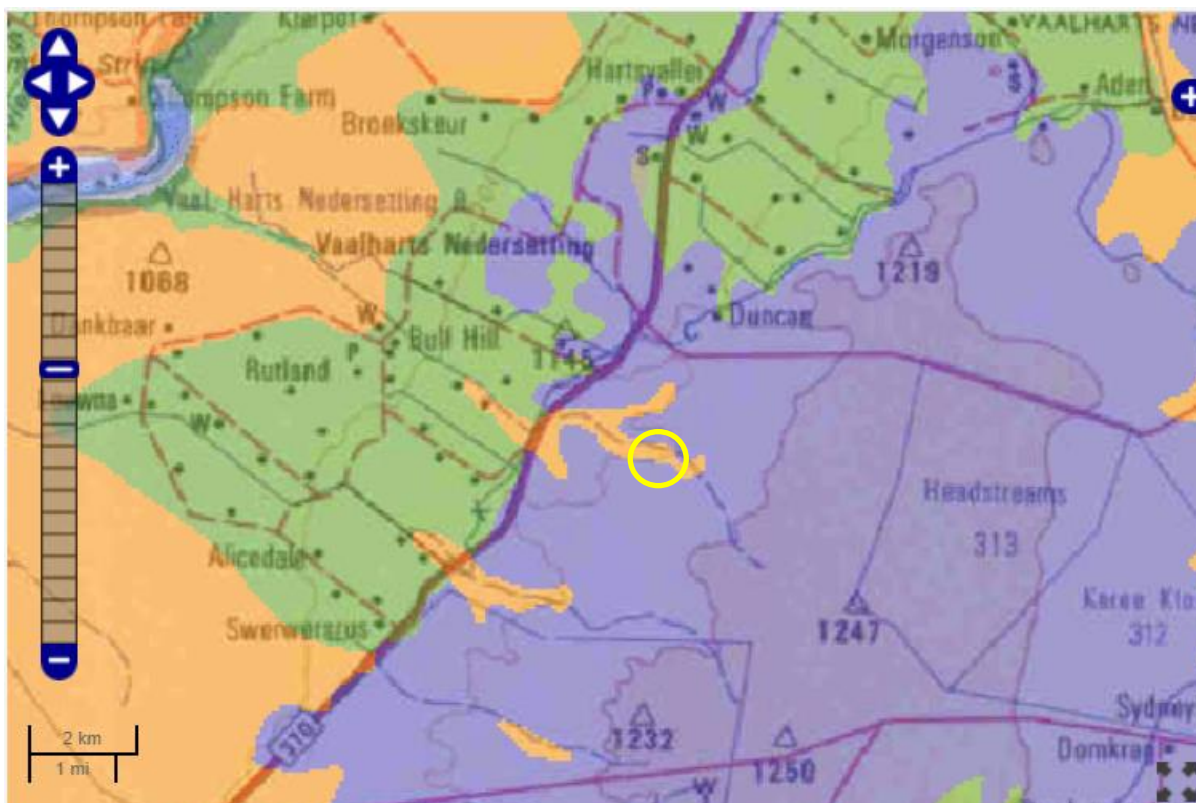


Figure 4: SAHRIS palaeosensitivity map for the site for the proposed PR/MR on a portion of Farm Duncan shown by the yellow circle. Background colours indicate the following degrees of sensitivity: red = very highly sensitive; orange/yellow = high; green = moderate; blue = low; grey = insignificant/zero.

4. Impact assessment

An assessment of the potential impacts to possible palaeontological resources considers the criteria encapsulated in Table 3:

Table 3a: Criteria for assessing impacts

PART A: DEFINITION AND CRITERIA		
Criteria for ranking of the SEVERITY/NATURE of environmental impacts	H	Substantial deterioration (death, illness or injury). Recommended level will often be violated. Vigorous community action.
	M	Moderate/ measurable deterioration (discomfort). Recommended level will occasionally be violated. Widespread complaints.
	L	Minor deterioration (nuisance or minor deterioration). Change not measurable/ will remain in the current range. Recommended level will never be violated. Sporadic complaints.
	L+	Minor improvement. Change not measurable/ will remain in the current range. Recommended level will never be violated. Sporadic complaints.

	M+	Moderate improvement. Will be within or better than the recommended level. No observed reaction.
	H+	Substantial improvement. Will be within or better than the recommended level. Favourable publicity.
Criteria for ranking the DURATION of impacts	L	Quickly reversible. Less than the project life. Short term
	M	Reversible over time. Life of the project. Medium term
	H	Permanent. Beyond closure. Long term.
Criteria for ranking the SPATIAL SCALE of impacts	L	Localised - Within the site boundary.
	M	Fairly widespread – Beyond the site boundary. Local
	H	Widespread – Far beyond site boundary. Regional/ national
PROBABILITY (of exposure to impacts)	H	Definite/ Continuous
	M	Possible/ frequent
	L	Unlikely/ seldom

Table 3b: Impact Assessment

PART B: Assessment		
SEVERITY/NATURE	H	-
	M	-
	L	Volcanic rocks do not preserve fossils; so far there are no records from the Quaternary calcretes of plant or animal fossils in this region so it is very unlikely that fossils occur on the site. The impact would be negligible
	L+	-
	M+	-
	H+	-
	DURATION	L
M		-
H		Where manifest, the impact will be permanent.
SPATIAL SCALE	L	Since the only possible fossils within the area would be transported fossil bones or silicified wood in the calcretes, the spatial scale will be localised within the site boundary.
	M	-
	H	-
PROBABILITY	H	-
	M	-
	L	It is unlikely that any fossils would be found in the loose soils and sands that cover the area or in the calcretes that will be prospected/mined. Nonetheless, a Fossil Chance Find Protocol should be added to the eventual EMPr.

Based on the nature of the project, surface activities may impact upon the fossil heritage if preserved in the development footprint. The geological structures suggest that the rocks are either much too old and the wrong kind to contain fossils or might have trapped

transported fossils. Since there is a chance that transported fossils may be disturbed a Fossil Chance Find Protocol has been added to this report. Taking account of the defined criteria, the potential impact to fossil heritage resources is low.

5. Assumptions and uncertainties

Based on the geology of the area and the palaeontological record as we know it, it can be assumed that the formation and layout of the basalts, sandstones, shales and sands are typical for the country and only some contain fossil wood or vertebrate bones. The sands of the Quaternary period would not preserve fossils but might trap or obscure fossils.

6. Recommendation

Based on experience and the lack of any previously recorded fossils from the area, it is unlikely that any fossils would be preserved in the volcanic rocks of the Allanridge Formation. There is a chance that robust but fragmentary and transported fossils may occur in the Quaternary sands and calcretes so a Fossil Chance Find Protocol should be added to the EMPr. If fossils are found by the environmental officer, or other responsible person once excavations or drilling activities have commenced then they should be rescued and a palaeontologist called to assess and collect a representative sample. The impact on the palaeontological heritage would be low, so as far as the palaeontology is concerned, the prospecting/mining application should be granted.

7. References

Anderson, J.M., Anderson, H.M., 1985. Palaeoflora of Southern Africa: Prodrum of South African megaflores, Devonian to Lower Cretaceous. A.A. Balkema, Rotterdam. 423 pp.

Bamford, M.K. 2003. Fossil woods from Auchas and their palaeoenvironment. *Geology and Palaeobiology of the central and southern Namib Desert, southwestern Africa. Volume 2: Palaeontology. Geological Survey of Namibia, Memoirs, 19, 23-34.*

Bamford, M.K., de Wit, M.C.J. 1993. Taxonomic description of fossil wood from Cainozoic Sak River terraces, near Brandvlei, Bushmanland, South Africa. *Palaeontologia africana, 30, 71-80.*

Botha, G.A., 2021. Cenozoic stratigraphy of South Africa: current challenges and future possibilities. *South African Journal of Geology 124, 817-842.*

Briggs, D.E.G., McMahon, S., 2016. The role of experiments in the taphonomy of exceptional preservation. *Palaeontology 59, 1-11.*

De Wit, M.C.J., 1999. Post-Gondwana drainage and the development of diamond placers in western South Africa. *Economic Geology, 94, 721-740.*

De Wit, M.C.J., Bamford, M.K. 1993. Fossil wood from the Brandvlei area, Bushmanland, as an indication of palaeoenvironmental changes during the Cainozoic. *Palaeontologia africana*, 30, 81-89.

De Wit, M.C.J. Ward, J.D., Bamford, M.K., Roberts, M., 2009. The significance of the Cretaceous Diamondiferous gravel deposit at Mahura Muthla in the Vryburg District of the Northern Cape Province in South Africa. *South African Journal of Geology* 112, 89-108.

Johnson, M.R., van Vuuren, C.J., Visser, J.N.J., Cole, D.I., Wickens, H.deV., Christie, A.D.M., Roberts, D.L., Brandl, G., 2006. Sedimentary rocks of the Karoo Supergroup. 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 461 – 499.

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.

Van der Westhuizen, W.A., de Bruijn, H., Meintjes, P.G., 2006. The Ventersdorp Supergroup. 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 187-208.

8. Chance Find Protocol

Monitoring Programme for Palaeontology – to commence once the excavations / drilling / mining activities begin.

1. The following procedure is only required if fossils are seen on the surface and when drilling/excavations/mining commence.
2. When excavations begin the rocks and discard must be given a cursory inspection by the environmental officer or designated person. Any fossiliferous material (plants, insects, bone or coal) should be put aside in a suitably protected place. This way the project activities will not be interrupted.
3. Photographs of similar fossils must be provided to the developer to assist in recognizing the fossil plants, vertebrates, invertebrates or trace fossils in the shales and mudstones (for example see Figure 5). This information will be built into the EMP's training and awareness plan and procedures.
4. Photographs of the putative fossils can be sent to the palaeontologist for a preliminary assessment.
5. If there is any possible fossil material found by the contractor, developer or environmental officer then the qualified palaeontologist sub-contracted for this project, should visit the site to inspect the selected material and check the dumps where feasible.
6. Fossil plants or vertebrates that are considered to be of good quality or scientific interest by the palaeontologist must be removed, catalogued and

housed in a suitable institution where they can be made available for further study. Before the fossils are removed from the site a SAHRA permit must be obtained. Annual reports must be submitted to SAHRA as required by the relevant permits.

7. If no good fossil material is recovered then no site inspections by the palaeontologist will be necessary. A final report by the palaeontologist must be sent to SAHRA once the project has been completed and only if there are fossils.
8. If no fossils are found and the excavations have finished then no further monitoring is required.

9. Appendix A – Examples of fossils from the Quaternary sands and calcretes



Figure 5: Photographs of robust, fragmentary and transported fossil recovered from Quaternary deposits.

10. Appendix B – Details of specialist

Curriculum vitae (short) - Marion Bamford PhD January 2023

Present employment: Professor; Director of the Evolutionary Studies Institute.
Member Management Committee of the NRF/DSI Centre of Excellence Palaeosciences, University of the Witwatersrand, Johannesburg, South Africa

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E-mail : marion.bamford@wits.ac.za ;
marionbamford12@gmail.com

ii) Academic qualifications

Tertiary Education: All at the University of the Witwatersrand:

1980-1982: BSc, majors in Botany and Microbiology. Graduated April 1983.

1983: BSc Honours, Botany and Palaeobotany. Graduated April 1984.

1984-1986: MSc in Palaeobotany. Graduated with Distinction, November 1986.

1986-1989: PhD in Palaeobotany. Graduated in June 1990.

iii) Professional qualifications

Wood Anatomy Training (overseas as nothing was available in South Africa):

1994 - Service d'Anatomie des Bois, Musée Royal de l'Afrique Centrale, Tervuren, Belgium, by Roger Dechamps

1997 - Université Pierre et Marie Curie, Paris, France, by Dr Jean-Claude Koeniguer

1997 - Université Claude Bernard, Lyon, France by Prof Georges Barale, Dr Jean-Pierre Gros, and Dr Marc Philippe

iv) Membership of professional bodies/associations

Palaeontological Society of Southern Africa: 1983 onwards

Royal Society of Southern Africa - Fellow: 2006 onwards

Academy of Sciences of South Africa - Member: Oct 2014 onwards

International Association of Wood Anatomists - First enrolled: January 1991

International Organization of Palaeobotany – 1993+

Botanical Society of South Africa

South African Committee on Stratigraphy – Biostratigraphy - 1997 - 2016

SASQUA (South African Society for Quaternary Research) – 1997+

PAGES - 2008 –onwards: South African representative

ROCEEH / WAVE – 2008+

INQUA – PALCOMM – 2011+onwards

v) Supervision of Higher Degrees

All at Wits University

Degree	Graduated/completed	Current
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Honours	13	0
Masters	13	3
PhD	13	7
Postdoctoral fellows	14	4

vi) Undergraduate teaching

Geology II – Palaeobotany GEOL2008 – average 65 students per year

Biology III – Palaeobotany APES3029 – average 25 students per year

Honours – Evolution of Terrestrial Ecosystems; African Plio-Pleistocene Palaeoecology;

Micropalaeontology – average 12 - 20 students per year.

vii) Editing and reviewing

Editor: Palaeontologia africana: 2003 to 2013; 2014 – Assistant editor

Guest Editor: Quaternary International: 2005 volume

Member of Board of Review: Review of Palaeobotany and Palynology: 2010 –

Associate Editor: Cretaceous Research: 2018-2020

Associate Editor: Royal Society Open: 2021 -

Review of manuscripts for ISI-listed journals: 30 local and international journals

viii) Palaeontological Impact Assessments

25 years' experience in PIA site and desktop projects

- Selected from recent projects only – list not complete:
- Skeerpoort Farm Mast 2020 for HCAC
- Vulindlela Eco village 2020 for 1World
- KwaZamakhule Township 2020 for Kudzala
- Sunset Copper 2020 for Digby Wells
- McCarthy-Salene 2020 for Prescali
- VLNR Lodge 2020 for HCAC
- Madadeni mixed use 2020 for Enviropro
- Frankfort-Windfield Eskom Powerline 2020 for 1World
- Beaufort West PV Facility 2021 for ACO Associates
- Copper Sunset MR 2021 for Digby Wells
- Sannaspos PV facility 2021 for CTS Heritage
- Smithfield-Rouxville-Zastron PL 2021 for TheroServe
- Glosam Mine 2022 for AHSA
- Wolf-Skilpad-Grassridge OHPL 2022 for Zutari
- Iziduli and Msenge WEFs 2022 for CTS Heritage
- Hendrina North and South WEFs & SEFs 2022 for Cabanga
- Dealesville-Springhaas SEFs 2022 for GIBB Environmental
- Vhuvhili and Mukondelei SEFs 2022 for CSIR
- Chemwes & Stilfontein SEFs 2022 for CTS Heritage
- Equestria Exts housing 2022 for Beyond Heritage
- Zeerust Salene boreholes 2022 for Prescali
- Tsakane Sewer upgrade 2022 for Tsimba
- Transnet MPP inland and coastal 2022 for ENVASS
- Ruighoek PRA 2022 for SLR Consulting (Africa)
- Namli MRA Steinkopf 2022 for Beyond Heritage

ix) Research Output

Publications by M K Bamford up to January 2022 peer-reviewed journals or scholarly books: over 170 articles published; 5 submitted/in press; 14 book chapters.

Scopus h-index = 31; Google Scholar h-index = 39; -i10-index = 116 based on 6568 citations.

Conferences: numerous presentations at local and international conferences.