# Palaeontological Impact Assessment for the proposed residential development on Furrow Road, Equestria Ext 283, Gauteng Province

**Desktop Study (Phase 1)** 

For

**Heritage Contracts and Archaeological Consulting** 

09 August 2021

**Prof Marion Bamford** 

Palaeobotanist
P Bag 652, WITS 2050
Johannesburg, South Africa
Marion.bamford@wits.ac.za

# **Expertise of Specialist**

The Palaeontologist Consultant: Prof Marion Bamford Qualifications: PhD (Wits Univ, 1990); FRSSAf, ASSAf Experience: 32 years research; 24 years PIA studies

# **Declaration of Independence**

This report has been compiled by Professor Marion Bamford, of the University of the Witwatersrand, sub-contracted by Heritage Contracts and Archaeological Consulting, Modimolle, 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:

# **Executive Summary**

A palaeontological Impact Assessment was requested for the proposed construction of a Residential 3 Development of 109 units on Furrow Road, Equestria Extension 284, east of Pretoria, Gauteng Province. To comply with 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 south-eastern part of the site lies on non-fossiliferous diabase, but the north-western part of the proposed site lies on the shallow to deep water high energy shales of the Silverton Formation (Pretoria Group, Transvaal Supergroup) that are about 2250 million years old. None of the geological literature indicates the presence of any stromatolites but the Palaeotechnical Report for the North West Province interprets the formation as being highly sensitive. Although there is an extremely small chance that stromatolites are present, a Fossil Chance Find Protocol should be added to the EMPr. Based on this information it is recommended that no palaeontological site visit is required unless fossils are found when the excavations commence.

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# 1. Background

The proposed residential development in Equestria Extension 284, east of Pretoria, requires an Environmental Impact assessment, including a palaeontological assessment.

#### PROJECT LOCATION

The development site is on Furrow Road, Equestria Ext 284 and is for a Residential 3 Development. The total area of the property is 2.1975 Ha and at a density of 50 units per hectare, there will be 109 units in total. The site currently has a group of small buildings on it and is surrounded by other densely developed residential complexes (Figure 1).

A Palaeontological Impact Assessment was requested for the 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: Specialist report requirements in terms of Appendix 6 of the EIA Regulations (amended 2017)

	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
aii	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	
С	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
е	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
g	An identification of any areas to be avoided, including buffers	None

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 7, Appendix A
I	Any conditions for inclusion in the environmental authorisation	Section 7
m	Any monitoring requirements for inclusion in the EMPr or environmental authorisation	Section 7, Appendix A
ni	A reasoned opinion as to whether the proposed activity or portions thereof should be authorised	Section 7, 8
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	Section 7
0	A description of any consultation process that was undertaken during the course of carrying out the study	None
р	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
	<u>l</u>	

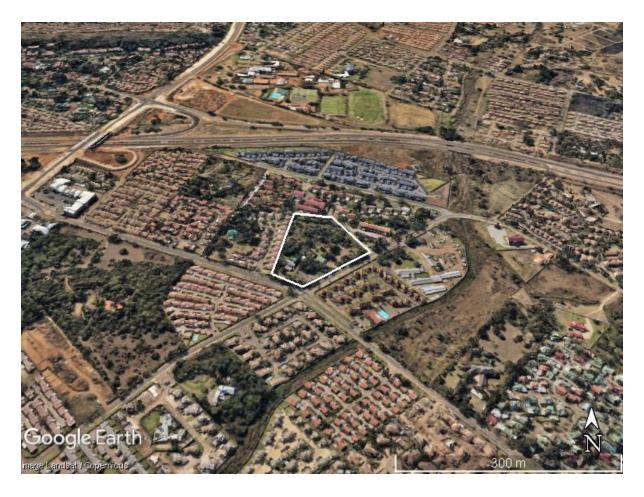


Figure 1: Google Earth map of the proposed Equestria Ext 284 residential development on Furrow Road with the site as indicated. Map supplied by HCAC.

# 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:

- Consultation of geological maps, literature, palaeontological databases, published and unpublished records to determine the likelihood of fossils occurring in the affected areas. Sources included 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 2: Geological map of the area around the Equestria, east of Pretoria, for the proposed Furrow Road residential development, shown in within the yellow outline. Abbreviations are explained in Table 2. Map enlarged from the Geological Survey 1: 250 000 map 2528 Pretoria.

Table 2: Explanation of symbols for the geological map and approximate ages (Eriksson et al., 2006. Johnson et al., 2006; Zeh et al., 2020). SG = Supergroup; Fm = Formation; Ma = million years; grey shading = formations impacted by the project.

Symbol	Group/Formation	Lithology	Approximate Age
Q	Quaternary sands	Sand, soil, alluvium, scree	Quaternary, last 2.5 Ma
di	diabase	Diabase or dolerite dyke	<2050 Ma
Vsi	Silverton Fm, Pretoria Group, Transvaal SG	Slate, shale, hornfels	Ca 2202 Ma
Vdq	Daspoort Fm, Pretoria Group, Transvaal SG	quartzite	Ca 2240 Ma
Vst	Strubenkop Fm, Pretoria Group, Transvaal SG	Shales, in places ferruginous	Ca 2242 Ma
Vha	Hekpoort Fm, Pretoria Group, Transvaa, SG	Volcanic rocks	Ca 2243 Ma

The site is the middle of the Transvaal Basin that was being infilled about 2600 to 2050 million years ago by marine sediments and volcanic rocks. The rocks are known as the Transvaal Supergroup and have been divided into four groups, with the basal Protobasinal Rocks, Black Reef Formation, Chuniespoort Group (with seven formations), a break of about 80 million years with no deposits and the top group, the Pretoria Group that has twelve formations (Eriksson et al., 2006, 2012; Lenhardt et al., 2012). The Silverton Formation (Pretoria Group) was laid down in a shallow to deep marine environment in an intercratonic sag basin (ibid) and the sediments are composed of shales, tuffaceous shales and a pyroclastic volcanic member. According to Eriksson et al., (2009), the basal Boven Shale Member is present to the east of Rustenburg. Although the Silverton Formation deposition style is a Shaw-Irwin model there are some differences because the inshore low-energy zone is missing and instead there seems to have been a strongly tidal coastline (Eriksson and Reczko, 1995; Eriksson et al., 2002, 2012).

Dolerite, or diabase as it is called for the Transvaal Supergroup has intruded through the strata of this group, and is volcanic in origin. Much younger Quaternary sands and alluvium have been deposited along the rivers and streams.

# ii. Palaeontological context

The palaeontological sensitivity of the area under consideration is presented in Figure 3. The site for development is in the Silverton Formation, most probably the basal Boven Shale Member. It has been interpreted as a high-stand facies tract that reflects the advance of an epeiric sea onto the Kaapvaal Craton from the east, and therefore the underlying Daspoort Formation would represent a low-stand facies tract or a transgressive systems tract (Eriksson et al., 2006). There is consensus in the geological literature that the Silverton Formation environment was a high energy one with shallow to deep water shales being deposited as sub-storm wave-base pelagic deposits, within an epeiric embayment on the Kaapvaal Craton (Eriksson et al., 2002, 2006, 2012; Frauenstein et al., 2009; Lenhardt et al., 2020). Several sub aqueous dykes and volcanic eruptions have also been recoded (Lenhardt et al., 2020). The formation is dated between 2202 and 2253 Ma (Zeh et al., 2020) and this is too old for any body fossils so the only fossils were microscopic algae and bacteria which if preserved, are in the form of the trace fossils such as stromatolites or microbial mats. There are no records of such trace fossils in the Silverton Formation although they are present in the overlying Magaliesberg Formation.

The Gauteng Province Palaeotechnical Report indicates that the Silverton Formation is highly sensitive as there are stromatolites (Groenewald et al., 2014), but no evidence has been supplied and the geological records do not support this conclusion. Stromatolites and microbial mats are formed in shallow, low energy environments, and the latter have been recorded from the overlying Magaliesberg Formation (Figure 2; Table 2). That formation was deposited in shallow and shoreline settings (Eriksson et al., 2006, 2012).



Figure 3: SAHRIS palaeosensitivity map for the site for the proposed Equestria Ext 284 residential development on Furrow Road shown within the red rectangle. Background colours indicate the following degrees of sensitivity: red = very highly sensitive; orange/yellow = high; green = moderate; blue = low; grey = insignificant/zero.

From the SAHRIS map above the area is indicated having no sensitivity for the southeast part, and for the northwest part as highly sensitive (orange) but the latter is not supported by the geological records as discussed above.

# 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	H	Substantial deterioration (death, illness or injury). Recommended level will often be violated. Vigorous community action.	
	М	Moderate/ measurable deterioration (discomfort). Recommended level will occasionally be violated. Widespread complaints.	
impacts	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.	
		Substantial improvement. Will be within or better than the recommended level. Favourable publicity.	
	L	Quickly reversible. Less than the project life. Short term	
Criteria for ranking the DURATION of impacts	М	Reversible over time. Life of the project. Medium term	
DONATION of impacts	Н	Permanent. Beyond closure. Long term.	
Criteria for ranking the	L	Localised - Within the site boundary.	
SPATIAL SCALE of	М	Fairly widespread – Beyond the site boundary. Local	
impacts	Н	Widespread – Far beyond site boundary. Regional/ national	
PROBABILITY	Н	Definite/ Continuous	
(of exposure to	М	Possible/ frequent	
impacts)	L	Unlikely/ seldom	

**TABLE 3B: IMPACT ASSESSMENT** 

PART B: ASSESSMENT			
	Н	-	
	М	-	
SEVERITY/NATURE	L	Dykes do not preserve any fossils. High energy shallow to deep water muds of the Silverton Fm age (ca 2250Ma) do not preserve fossils and so far there are no records of microbial or trace fossils and so it is very unlikely that fossils occur on the site. The impact would be very unlikely.	
	L+	-	
	M+	-	
	H+	-	
	L	-	
DURATION	М	-	
	Н	Where manifest, the impact will be permanent.	
SPATIAL SCALE	L	Since the only possible fossils within the area would be microbial or trace fossils from the Silverton Fm, the spatial scale will be localised within the site boundary.	
	М	-	
	Н	-	
	Н	-	
	М	-	
PROBABILITY	L	It is extremely unlikely that any fossils would be found in the Silverton Fm because none has been recorded to date. 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 much too old to contain body fossils as they are about 2500 million years old and were deposited in a shallow to deep water high energy environment. Since there is an extremely small chance that trace fossils such as stromatolites and microbial mats do occur in the Shales of the Silverton Formation (Pretoria Group, Transvaal Supergroup), 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 extremely 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 diabase dykes, sandstones and shales are typical for the country and the Silverton Formation do not contain fossils, as indicated in the geological publications. Only the Palaeotechnical Report for the North West Province indicates that stromatolites occur in this formation but no evidence or reference is provided. The overlying soils of the Quaternary period would not preserve fossils.

# 6. Recommendation

Based on experience and the lack of any previously recorded fossils from the area, it is extremely unlikely that any fossils would be preserved in the shales of the Silverton Formation (Pretoria Group, Transvaal Supergroup) because the rocks are ancient and were deposited in a high energy environment where neither stromatolites would grow nor microbial mats form. According to the Palaeotechnical Report fossil stromatolites are present, therefore, a Fossil Chance Find Protocol should be added to the EMPr: if fossils are found once excavations for foundations and amenities have commenced then they should be rescued and a palaeontologist called to assess and collect a representative sample.

# 7. References

Bosch, P., Eriksson, P., 2017. A note on two occurrences of inferred microbial mat features preserved in the c. 2.1 Ga Magaliesberg Formation (Pretoria Group, Transvaal Supergroup) sandstones, near Pretoria, South Africa. South African Journal of Geology 111, 251-262.

Eriksson, P.G., Altermann, W., Eberhardt, L., Ahrend-Heidbrinck, S., Bumby, A.J., 2002b. Palaeoproterozoic epeiric sea palaeoenvironments: the Silverton Formation (Pretoria Group, Transvaal Supergroup), South Africa. In: Altermann, W., Corcoran, P.L. (Eds.), Precambrian Sedimentary Environments: A Modern Approach to Ancient Depositional Systems. Special Publication, 33. International Association of Sedimentologists, Blackwell, Oxford, pp. 351–367.

Eriksson, P.G., Bartman, R., Catuneanu, O., Mazumder, R., Lenhardt, N., 2012. A case study of microbial mats-related features in coastal epeiric sandstones from the Palaeoproterozoic Pretoria Group, Transvaal Supergroup, Kaapvaal craton, South Africa; the effect of preservation (reflecting sequence stratigraphic models) on the relationship between mat features and inferred palaeoenvironment. Sedimentary Geology 263, 67-75.

Eriksson, P.G., Reczko, B.F.F., 1995. The sedimentary and tectonic setting of the Transvaal Supergroup floor rocks to the Bushveld complex. Journal of African Earth Sciences 21, 487–504.

Frauenstein, F., Veizer, J., Beukes, N., Van Niekerk, H.S., Coetzee, L.L., 2009. Transvaal Supergroup carbonates: Implications for Paleoproterozoic  $\delta$ 18O and  $\delta$ 13C records. Precambrian Research 175, 149–160.

Groenewald, G., Groenewald, D., Groenewald, S., 2014. SAHRA Palaeotechnical Report. Palaeontological Heritage of Gauteng Province. 22 pages.

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.

Lenhardt, N., Bleeker, W., Ngwa, C.N., Aucamp, T., 2020. Shallow marine basaltic volcanism of the Machadodorp Member (Silverton Formation, Pretoria Group), Transvaal Basin, South Africa — An example of Paleoproterozoic explosive intraplate volcanic activity in an epeiric embayment. Precambrian Research 338, 105580. https://doi.org/10.1016/j.precamres.2019.105580

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.

Zeh, A., Wilson, A.H., Gerdes, A., 2020. Zircon U-Pb-Hf isotope systematics of Transvaal Supergroup – Constraints for the geodynamic evolution of the Kaapvaal Craton and its hinterland between 2.65 and 2.06 Ga. Precambrian Research 345, 105760.

# 8. Chance Find Protocol

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

- 1. The following procedure is only required if fossils are seen on the surface and when drilling/excavations commence.
- 2. When excavations begin the rocks and must be given a cursory inspection by the environmental officer or designated person. Any fossiliferous material (stromatolites, plants, insects, bone) should be put aside in a suitably protected place. This way the project activities will not be interrupted.
- 3. Photographs of similar fossil plants must be provided to the developer to assist in recognizing the fossil plants in the shales and mudstones (for example see Figures 4, 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 developer/environmental officer/miners 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.

# Appendix A – Examples of trace fossils from the Transvaal Supergroup



Figure 4: Stromatolites as seen from the surface.

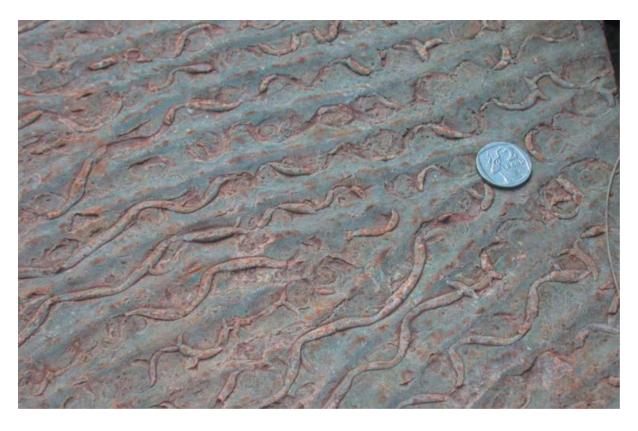


Figure 5: Vermiform trace fossil *Manchuriophycus* from a bedding plane in the Magaliesberg Formation east of Pretoria. Figure taken from Bosch and Eriksson (2017; Fig 7).

# Appendix B – Details of specialist

# **Curriculum vitae (short) - Marion Bamford PhD Jan 2021**

#### I) Personal details

Surname : Bamford

First names : Marion Kathleen

Present employment: Professor; Director of the Evolutionary Studies Institute.

Member Management Committee of the NRF/DST Centre of Excellence Palaeosciences, University of the Witwatersrand,

Johannesburg, South Africa-

Telephone : +27 11 717 6690 Fax : +27 11 717 6694 Cell : 082 555 6937

E-mail : <u>marion.bamford@wits.ac.za</u>; <u>marionbamford12@gmail.com</u>

# 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

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

#### vii) Supervision of Higher Degrees

#### All at Wits University

Degree	Graduated/completed	Current
Honours	9	2
Masters	9	5
PhD	11	5
Postdoctoral fellows	10	4

#### viii) 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 2-8 students per year.

#### ix) 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 –

Cretaceous Research: 2014 -

Journal of African Earth Sciences: 2020 -

Review of manuscripts for ISI-listed journals: 25 local and international journals

# x) Palaeontological Impact Assessments

Selected – list not complete:

- Thukela Biosphere Conservancy 1996; 2002 for DWAF
- Vioolsdrift 2007 for Xibula Exploration
- Rietfontein 2009 for Zitholele Consulting
- Bloeddrift-Baken 2010 for TransHex
- New Kleinfontein Gold Mine 2012 for Prime Resources (Pty) Ltd.
- Thabazimbi Iron Cave 2012 for Professional Grave Solutions (Pty) Ltd
- Delmas 2013 for Jones and Wagener
- Klipfontein 2013 for Jones and Wagener
- Platinum mine 2013 for Lonmin
- Syferfontein 2014 for Digby Wells
- Canyon Springs 2014 for Prime Resources
- Kimberley Eskom 2014 for Landscape Dynamics
- Yzermyne 2014 for Digby Wells
- Matimba 2015 for Royal HaskoningDV
- Commissiekraal 2015 for SLR
- Harmony PV 2015 for Savannah Environmental
- Glencore-Tweefontein 2015 for Digby Wells
- Umkomazi 2015 for JLB Consulting
- Ixia coal 2016 for Digby Wells
- Lambda Eskom for Digby Wells
- Alexander Scoping for SLR
- Perseus-Kronos-Aries Eskom 2016 for NGT
- Mala Mala 2017 for Henwood
- Modimolle 2017 for Green Vision
- Klipoortjie and Finaalspan 2017 for Delta BEC
- Ledjadja borrow pits 2018 for Digby Wells
- Lungile poultry farm 2018 for CTS
- Olienhout Dam 2018 for JP Celliers
- Isondlo and Kwasobabili 2018 for GCS
- Kanakies Gypsum 2018 for Cabanga
- Nababeep Copper mine 2018
- Glencore-Mbali pipeline 2018 for Digby Wells

- Remhoogte PR 2019 for A&HAS
- Bospoort Agriculture 2019 for Kudzala
- Overlooked Quarry 2019 for Cabanga
- Richards Bay Powerline 2019 for NGT
- Eilandia dam 2019 for ACO
- Eastlands Residential 2019 for HCAC
- Fairview MR 2019 for Cabanga
- Graspan project 2019 for HCAC
- Lieliefontein N&D 2019 for Enviropro
- Skeerpoort Farm Mast 2020 for HCAC
- Vulindlela Eco village 2020 for 1World
- KwaZamakhule Township 2020 for Kudzala
- Sunset Copper 2020 for Digby Wells

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# xi) Research Output

Publications by M K Bamford up to Jan 2021 peer-reviewed journals or scholarly books: over 150 articles published; 5 submitted/in press; 8 book chapters.

Scopus h-index = 29; Google scholar h-index = 35; -i10-index = 95

Conferences: numerous presentations at local and international conferences.

# xii) NRF Rating

NRF Rating: B-2 (2016-2020) NRF Rating: B-3 (2010-2015) NRF Rating: B-3 (2005-2009) NRF Rating: C-2 (1999-2004)