

**Palaeontological Impact Assessment for the proposed
prospecting rights application on farm Graspan 112
near Copperton, North West Province**

Desktop Study

For

Heritage Consultants

10 January 2019

Prof Marion Bamford

Palaeobotanist

P Bag 652, WITS 2050

Johannesburg, South Africa

Marion.bamford@wits.ac.za

Expertise of Specialist

The Palaeontologist Consultant is: Prof Marion Bamford
Qualifications: PhD (Wits Univ, 1990); FRSSAf, ASSAf
Experience: 30 years research; 22 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 Consultants, 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 prospecting rights application for base metals on portions of the farm Graspan 112 and Uitspan 115, southwest of Copperton, Prieska area, adjacent to the old Prieska Copper Mine. 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 prospecting rights application.

The proposed site lies on the Late Carboniferous-Early Permian Dwyka Group tillites, sands, shales, mudstones. Although fossils have not been reported from this site there is a small chance that typical (but very infrequent) early Glossopteris flora plants could occur in the sediments just below the surface. Surface exposures are likely to be very weathered. Therefore 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 revealed once excavations and drilling has commenced. As far as the palaeontology is concerned a prospecting right should be granted.

Table of Contents

Expertise of Specialist.....	1
Declaration of Independence.....	1
1. Background.....	4
2. Methods and Terms of Reference	6
i. Project location and geological context.....	7
ii. Palaeontological context	8
4. Impact assessment.....	10
5. Assumptions and uncertainties	11
6. Recommendation.....	11
7. References.....	12
8. Chance Find Protocol	13
Appendix A (examples of fossils	14
Appendix B (short CV of specialist)	16

1. Background

A Prospecting Right and Environmental Authorisation (EA) for prospecting activities in the vicinity of the historical Prieska Copper Mine (PCM) is in progress, in terms of the National Environmental Management Act 107 of 1998 and the Mineral and Petroleum Resources Development Act 28 of 2002. The following portions of Farm Graspan 112 relate to the prospecting right application:

Table 1: Relevant portions of Farms for this application

Farm Name	Farm Number	Portions
Graspan	112	5
Graspan	112	RE
Uitspan	115	1

A Palaeontological Impact Assessment was requested for the Graspan and Uitspan farms Prospecting Rights Application. 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 project.

Table 2: Specialist report requirements in terms of Appendix 6 of the EIA Regulations (2014)

A specialist report prepared in terms of the Environmental Impact Regulations of 2014 must contain:	Relevant section in report
Details of the specialist who prepared the report	Appendix B
The expertise of that person to compile a specialist report including a curriculum vitae	Appendix B
A declaration that the person is independent in a form as may be specified by the competent authority	Page 1
An indication of the scope of, and the purpose for which, the report was prepared	Section 1
The date and season of the site investigation and the relevance of the season to the outcome of the assessment	N/A
A description of the methodology adopted in preparing the report or carrying out the specialised process	Section 2
The specific identified sensitivity of the site related to the activity and its associated structures and infrastructure	Section ii Error! Reference source not found.
An identification of any areas to be avoided, including buffers	N/A

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
A description of any assumptions made and any uncertainties or gaps in knowledge;	Section 5
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
Any mitigation measures for inclusion in the EMPr	N/A
Any conditions for inclusion in the environmental authorisation	N/A
Any monitoring requirements for inclusion in the EMPr or environmental authorisation	Section 8
A reasoned opinion as to whether the proposed activity or portions thereof should be authorised	N/A
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	N/A
A description of any consultation process that was undertaken during the course of carrying out the study	N/A
A summary and copies if any comments that were received during any consultation process	N/A
Any other information requested by the competent authority.	N/A

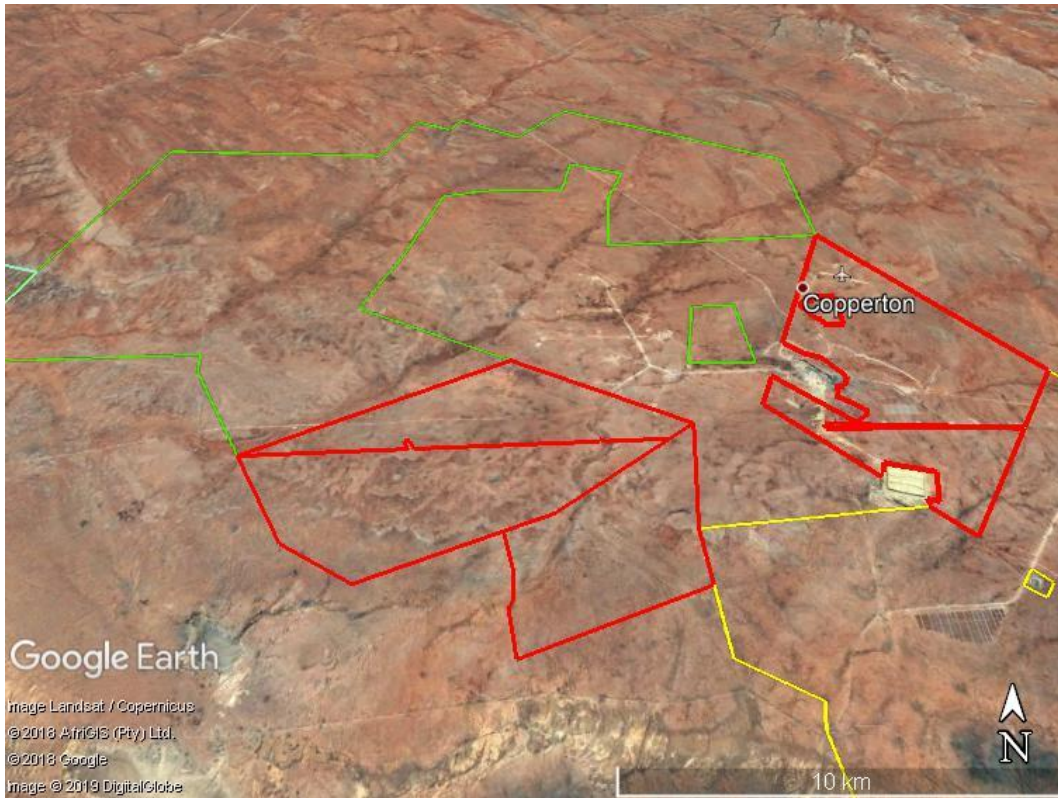


Figure 1: Google Earth map of the proposed area for the Graspan Prospecting Rights Application shown in the left red outline. Map supplied by Heritage Consultants.

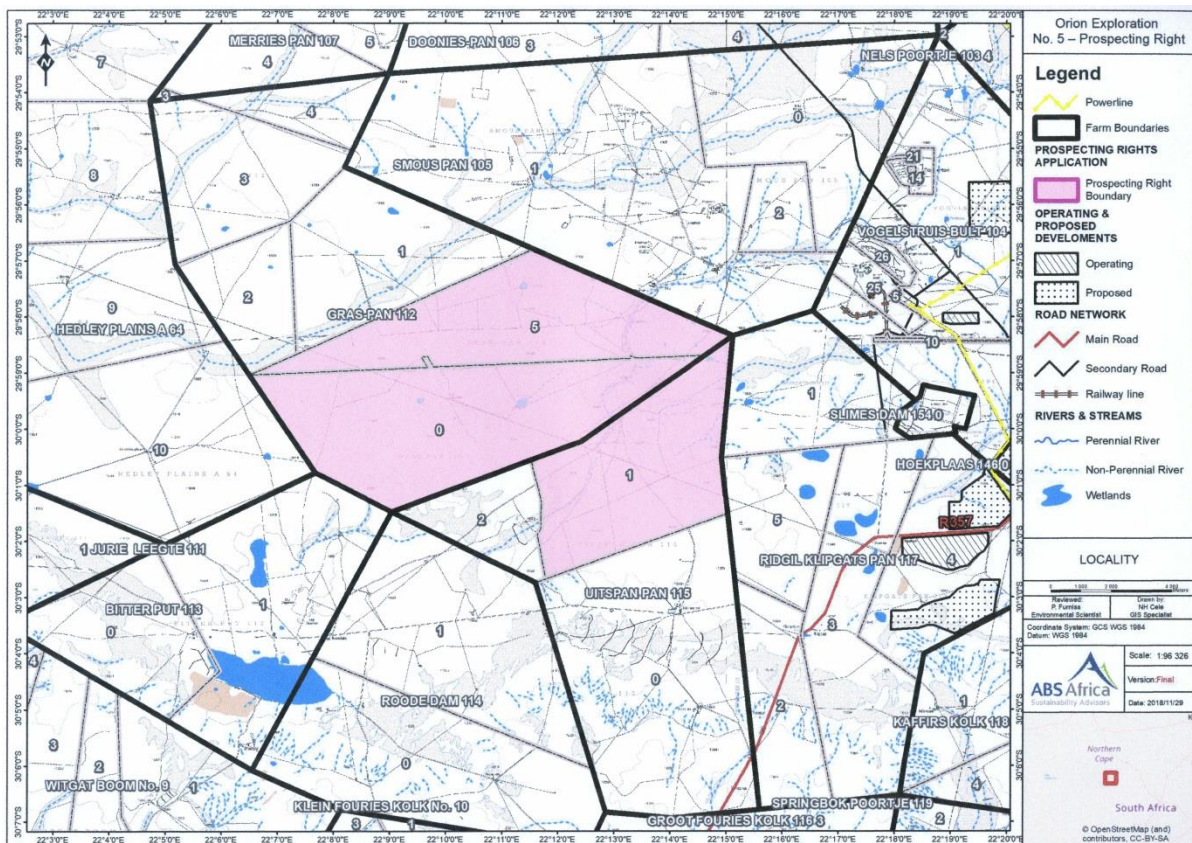


Figure 2: Site map for the Graspan prospecting rights area shown in lilac.

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 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

The oldest rocks in the area are those of the Keimos Suite and they are a group of syn- to post-tectonic granitoids that have intruded into the igneous and metamorphic rocks of the Namaqua-Natal Province. There are also outcrops of the quartzites of the Uitdraai Formation and the Dagbreek Formation. The rocks of the Prieska Copper Mine are known as the Copperton Volcanic Centre (Cornell et al., 2006) and include the Copperton Formation, the Kielder Formation, topped by the Dagbreek Formation.

Overlying this ancient rocks are sediments of the Dwyka Group and the Prince Albert Formation of the Ecca Group, both early Karoo Supergroup deposits from the receding glaciers and inland sea (Late Carboniferous to Early Permian in age). To the north and east much of the land surface is covered by alluvium, sands, silcretes and limestones that are much younger, from the Quaternary.

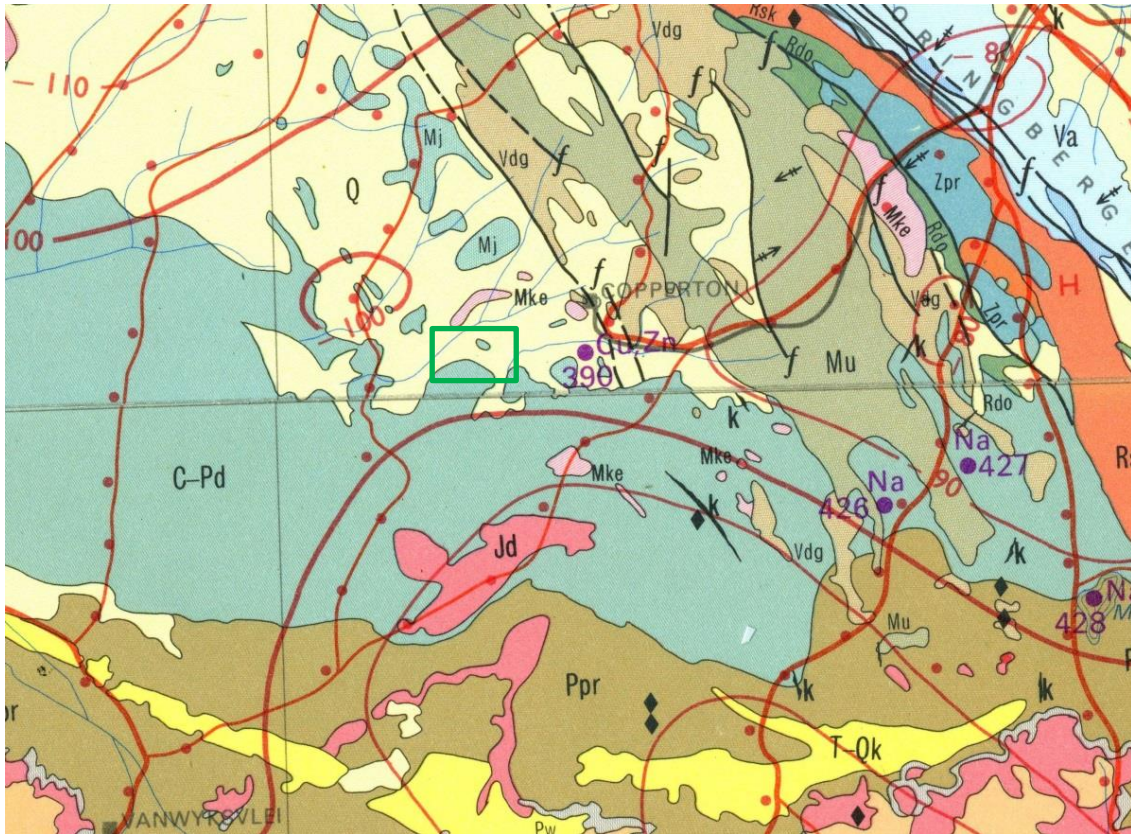


Figure 3: Geological map of the area around Copperton with the proposed site for the Graspan prospecting shown within the green rectangle. Abbreviations of the rock types are explained in Table 3. Map enlarged from the Geological Survey 1: 1 000 000 map 1984.

Table 3: Explanation of symbols for the geological map and approximate ages (Barbolini et al., 2016; Johnson et al., 2006; Cornell et al., 2006). SG = Supergroup; Fm = Formation.

Symbol	Group/Formation	Lithology	Approximate Age
Q	Quaternary	Alluvium, sand, calcrete	Neogene, ca 25 Ma to present
T-Qk	Tertiary-Quaternary	Sand, limestone	
Jd	Jurassic dykes	Dolerite dykes, intrusive	Jurassic, approx. 180 Ma
Ppr	Prince Albert Fm, Eccca Group, Karoo SG	Shale	290-283.5 Ma
C-Pd	Dwyka Group, Karoo SG	Tillite, sandstone, mudstone, shale	>290 Ma
Vdg	Dagbreek Fm, Vaalkoppies Group, Kaaien Terrane	Schist, quartzite, amphibolite	Ca 1800 – 2120 Ma
Mu	Uitdraai Fm, Brulpan Group, Kaaien Terrane	quartzite	Ca 1930 Ma
Mke	Keimos Suite, Kakamas Terrane	granite	Ca 1080-1090 Ma ??

ii. Palaeontological context

The palaeontological sensitivity of the area under consideration is presented in Figure 4. The site for prospecting is in the Dwyka Group tillites, sandstone, mudstone and shales, and these potentially could preserve fossils. Around 300-290 Ma the climate in southern Africa was still relatively cool, but there were well developed Carboniferous floras in the northern hemisphere. In South Africa, however, much of the land surface was covered by ice sheets. As they melted they dropped the moraine trapped in the ice, together with limited plant matter from the vegetation that gradually recovered and colonised the land surface. Terrestrial vertebrates had not evolved at this time. The late Carboniferous flora comprised *Glossopteris* leaves and seeds, wood, and other plants such as lycopods, sphenophytes and ferns.

The Dwyka Group is made up of seven facies that were deposited in a marine basin under differing environmental settings of glacial formation and retreat (Visser, 1986, 1989; Johnson et al., 2006). In the north these are called the Mbizane Formation, and the Elandsvlei Formation in the south. Described below are the seven facies (Johnson et al., 2006, p. 463-465):

The massive diamictite facies comprises highly compacted diamictite that is clast-poor in the north. It was deposited in subaqueous or subglacial positions.

The stratified diamictite comprises alternating diamictite, mudrock, sandstone and conglomerate beds. They are interpreted as being rapidly deposited, sediment gravity flows but with some possible reworking of the subglacial diamictites.

The massive carbonate-rich diamictite facies is clast-poor and was formed by the rainout of debris, with the carbonate probably originating by crystallisation from interstitial waters.

The conglomerate facies ranges from single layer boulder beds to poorly sorted pebble and granule conglomerates. The boulder beds are interpreted as lodgement deposits whereas the poorly sorted conglomerates are a product of water-reworking of diamicton by high-density sediment gravity flows.

The sandstone facies were formed as turbidite deposits.

The mudrock with stones facies represents rainout deposits in the distal iceberg zone.

The **mudrock facies** consists of dark-coloured, commonly carbonaceous mudstone, shale or silty rhythmite that was formed when the mud or silt in suspension settled. This is the only fossiliferous facies of the Dwyka Group.

The Dwyka *Glossopteris* flora outcrops are very sporadic and rare. Of the seven facies that have been recognised in the Dwyka Group fossil plant fragments have only been recognised from the mudrock facies. They have been recorded from around Douglas only (Johnson et al., 2006; Anderson and McLachlan 1976) although the Dwyka Group exposures are very extensive. Jurassic Dolerites do not contain fossils as they are igneous intrusives.

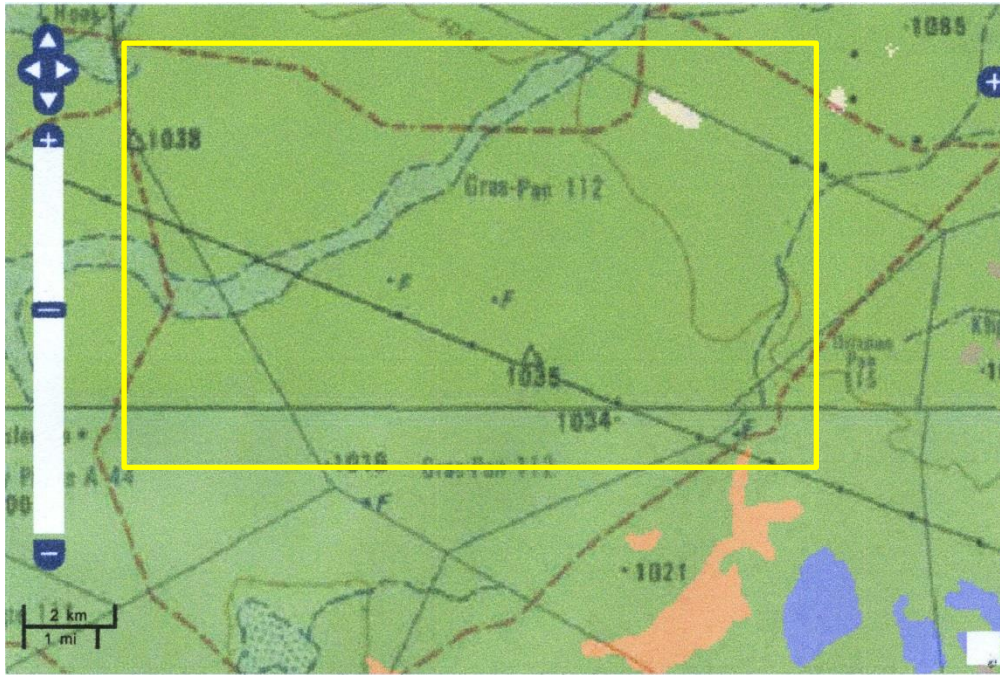


Figure 3: SAHRIS palaeosensitivity maps for the site for the proposed prospecting rights application, around the Farm Graspan 112 shown within the yellow rectangle. Colours indicate the following degrees of sensitivity: red = very highly sensitive; orange/yellow = high; green = moderate; blue = low; grey = insignificant/zero.

From the SAHRIS map above the area is indicated as moderately sensitive (green; Figure 4) so a desktop assessment is being reported upon here. No fossils have been reported from the Copperton area but there is a very small chance that fossil plant fragments could occur in the prospecting area, but relatively close to the surface because the underlying strata, that are the target of the project, are too old for fossils. Fossils are not likely to be seen on the land surface because of extensive weathering and previous farming or mining activities.

4. Impact assessment

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

TABLE 4A: 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 4B: IMPACT ASSESSMENT

PART B: ASSESSMENT		
SEVERITY/NATURE	H	-
	M	-
	L	Loose sands do not preserve plant fossils; so far there are no records from the Dwyka Group of plant or animal fossils in this region so it is very unlikely that fossils occur on the site. The impact would be very unlikely.
	L+	-
	M+	-
	H+	-
DURATION	L	-
	M	-
	H	Where manifest, the impact will be permanent.
SPATIAL SCALE	L	Since only the possible fossils within the area would be fossil plants from the <i>Glossopteris</i> flora in the shales, 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 sand that will be drilled through but there may be plant fragments in the underlying shales or mudstones. There will be no fossils in the rocks that are being targeted for the mining operation as they are too old. Nonetheless a 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. Overlying rocks of the Dwyka Group, namely the mudstones or shales might preserve fossil plants but the target rocks for the project are much too old to contain fossils and are igneous in origin. Furthermore, the material to be mined is loose sand and this does not preserve fossils. Since there is an extremely small chance that fossils from the Late Carboniferous Dwyka Group 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 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 dolomites, sandstones, shales and sands are typical for the country and do contain fossil plant, insect, invertebrate and vertebrate material. The sands of the Quaternary period would not preserve fossils. The deep target rocks would not contain 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 overlying loose sands of the Quaternary. There is a very small chance that fossil plant fragments may occur in the Dwyka Group shales and mudstones so a Chance Find Protocol should be added to the EMPr: if fossils are found once drilling and prospecting has commenced then they should be rescued and a palaeontologist called to assess and collect a representative sample.

7. References

Anderson, A.M., 1981. The *Umfolozia* arthropod trackways in the Permian Dwyka and Ecca Series of South Africa. *Journal of Palaeontology* 55, 84-108.

Anderson, A.M., McLachlan, I.R., 1976. The plant record in the Dwyka and Ecca Series (Permian) of the south-western half of the great Karoo Basin, South Africa. *Palaeontologia africana* 19, 31-42.

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

Barbolini, N., Bamford, M.K., Rubidge, B., 2016. Radiometric dating demonstrates that Permian spore-pollen zones of Australia and South Africa are diachronous. *Gondwana Research* 37, 241-251.

Cornell, D.H., Thomas, R.J., Moen, H.F.G., Reid, D.L., Moore, J.M., Gibson, R.L., 2006. The Namaqua-Natal Province. 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 325-379.

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.

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.

Visser, J.N.J., 1986. Lateral lithofacies relationship in the glaciogenic Dwyka Formation in the western and central parts of the Karoo Basin. Transactions of the Geological Society of South Africa 89, 373-383.

Visser, J.N.J., 1989. The Permo-Carboniferous Dwyka Formation of southern Africa: deposition by a predominantly subpolar marine icesheet. Palaeogeography, Palaeoclimatology, Palaeoecology 70, 377-391.

8. Chance Find Protocol

Monitoring Programme for Palaeontology – to commence once the drilling and prospecting begin.

1. The following procedure is only required if fossils are seen on the surface and when drilling or excavations commence.
2. When drilling or excavations begin the rocks and must be given a cursory inspection by the environmental officer or designated person. Any fossiliferous material (plants, insects, wood, bone, coal) should be put aside in a suitably protected place. This way the prospecting 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 Figure 5, 6). 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 the site inspections by the palaeontologist will not be necessary. Annual reports by the palaeontologist must be sent to SAHRA.
8. If no fossils are found and the excavations have finished then no further monitoring is required.

Appendix A – Examples of Dwyka fossils

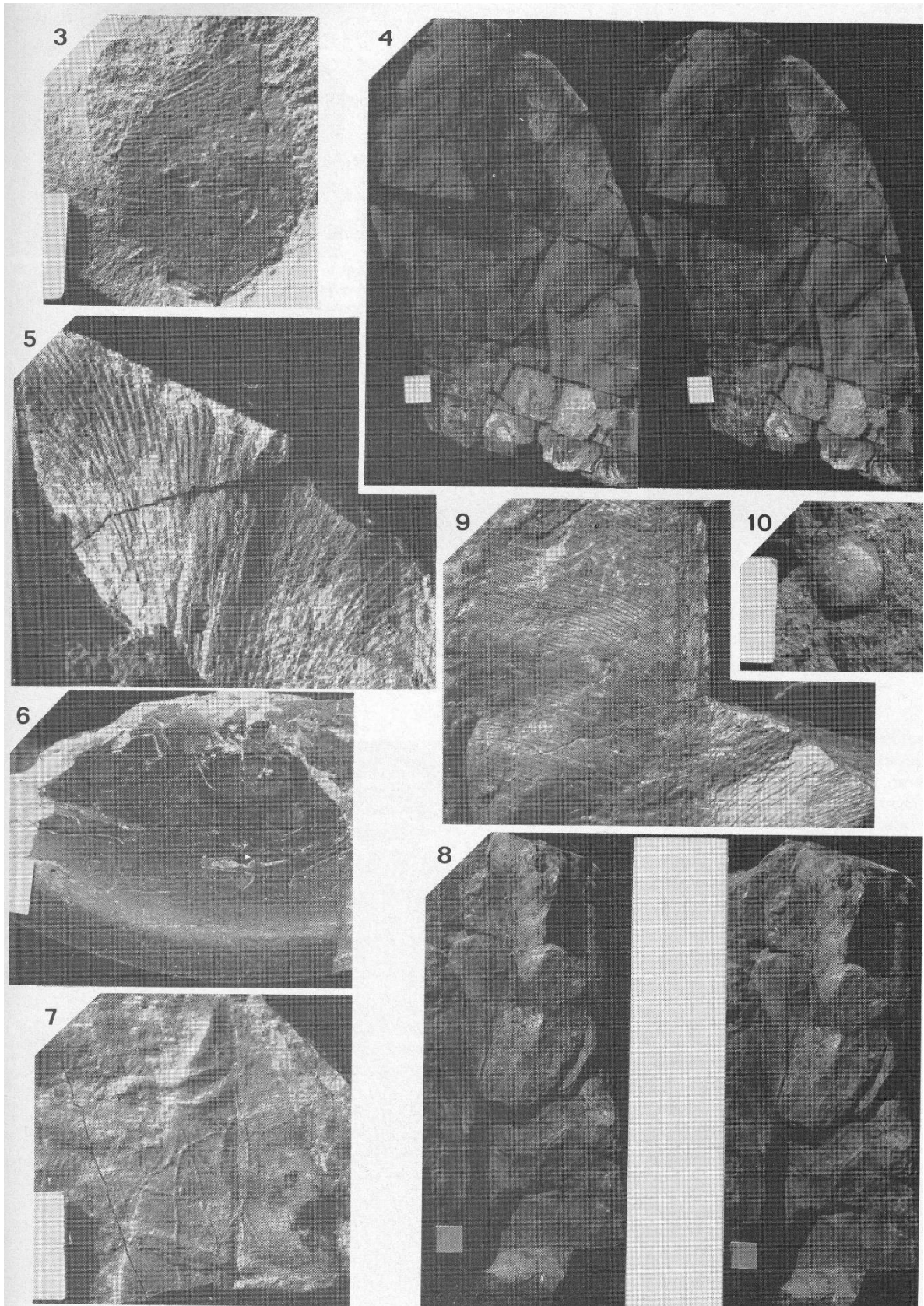


Figure 6: Fossil plants from the Dwyka Group near Douglas (From Anderson and McLachlan, 1976, (figures 3-10)).

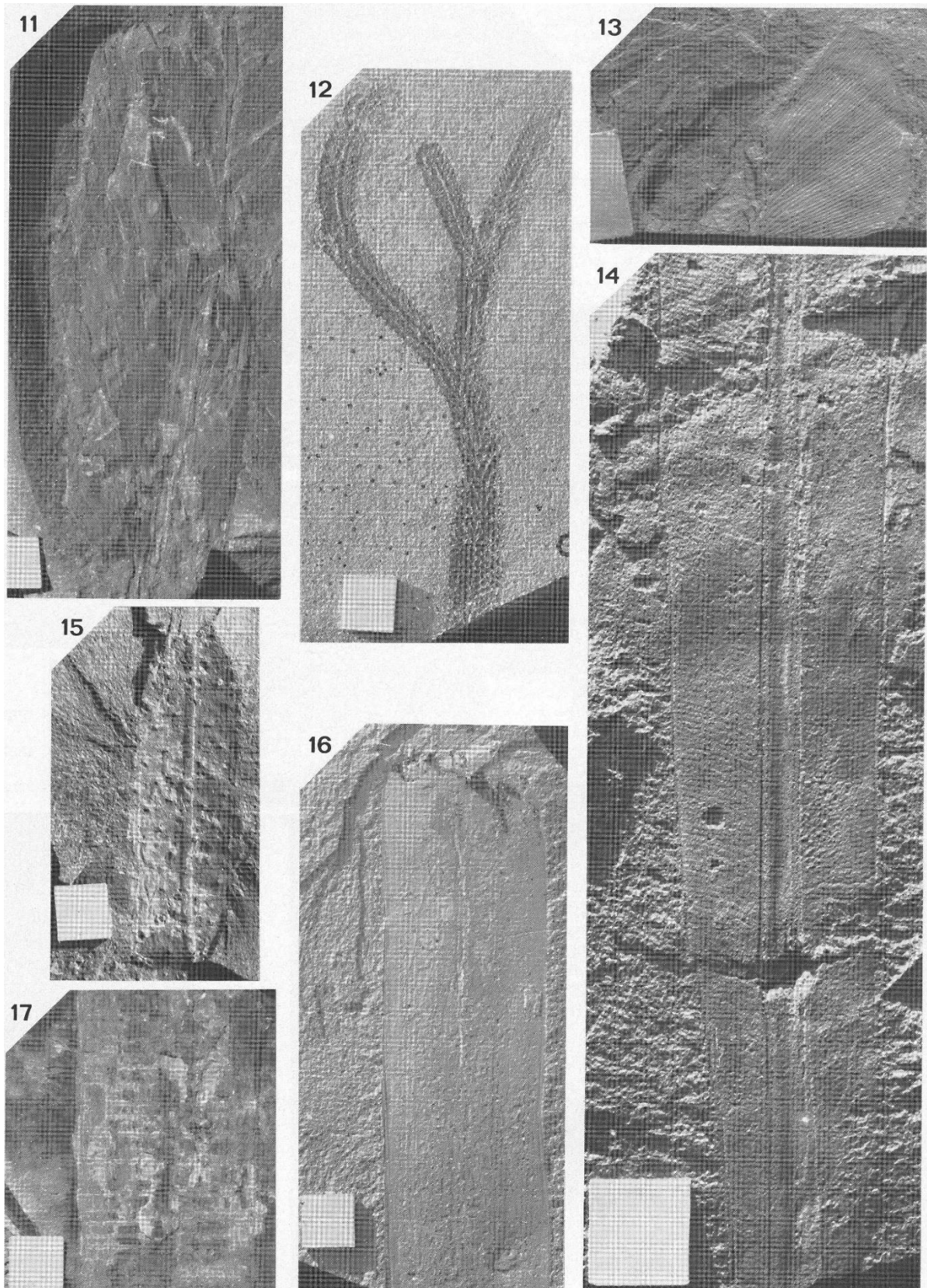


Figure 6: More examples of fossil plants from the Dwyka group near Douglas (from Anderson and McLachlan, 1976, figures 11-17).

Curriculum vitae (short) - Marion Bamford PhD January 2019

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 : 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 – 1984 to present
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	6	1
Masters	8	1
PhD	10	3
Postdoctoral fellows	9	3

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 onwards – Assistant editor
 Guest Editor: *Quaternary International*: 2005 volume
 Member of Board of Review: *Review of Palaeobotany and Palynology*: 2010 –
Cretaceous Research: 2014 -

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
- Amandelbult 2018 for SRK
- 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
- SARAO 2018 for Digby Wells
- Ventersburg B 2018 for NGT
- Hanglip Service Station 2018 for HCAC
-

xi) Research Output

Publications by M K Bamford up to January 2019 peer-reviewed journals or scholarly books: over 125 articles published; 5 submitted/in press; 8 book chapters.

Scopus h index = 27; Google scholar h index = 29;

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)