# Palaeontological Impact Assessment for the proposed construction of two footbridges at Mdantsane, Eastern Cape Province

**Desktop Study** 

For

CTS Heritage

16 March 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 CTS Heritage, Cape Town, 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 two footbridges in the town of Mdantsane, 15km northwest of East London. 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.

The proposed sites lie on the sandstones and mudstones of the Middleton Formation which is late Permian, (Adelaide Subgroup, Beaufort Group, Karoo Supergroup Although fossils have not been reported from this site there is a small chance that typical vertebrates of the *Pristerognathus, Tropidostoma* and *Cistecephalus* Assemblage Zones could occur, as well as typical (but very infrequent) late *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 the project can proceed.

# **Table of Contents**

	Expertise of Specialist	1			
	Declaration of Independence	1			
1.	Background	4			
2.	Methods and Terms of Reference	5			
i.	Project location and geological context	7			
ii	. Palaeontological context	7			
4.	Impact assessment	9			
5.	Assumptions and uncertainties	10			
6.	Recommendation	10			
7.	References	10			
8.	Chance Find Protocol	11			
Apı	ppendix A (examples of fossils)12				
Apı	pendix B (short CV of specialist)	17			

## 1. Background

This application is for the proposed development of two pedestrian foot bridges in Mdantsane, located 15km outside of East London in the Eastern Cape. Mdantsane was established in 1963 in response to the Apartheid Government's Group Areas Act requirements. The footbridges have a very small footprint and will bridge two minor streams within a dense housing area.

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 1: 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 appealing identified consists its refit to site related to the notivity and its	Section ii
The specific identified sensitivity of the site related to the activity and its associated structures and infrastructure	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

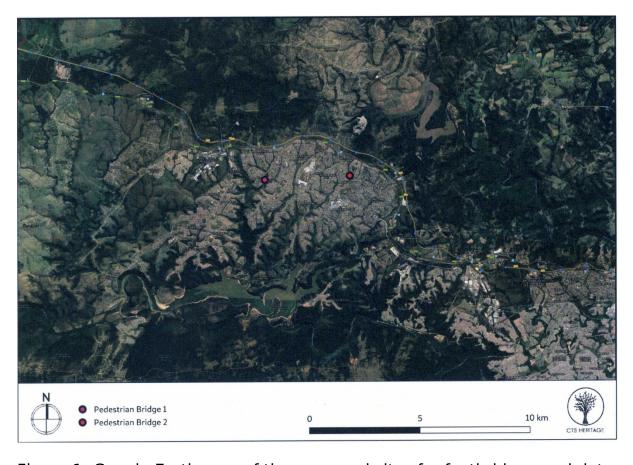


Figure 1: Google Earth map of the proposed sites for footbridges, red dots, in Mdantsane, near East London. Map supplied by CTS Heritage.

## 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

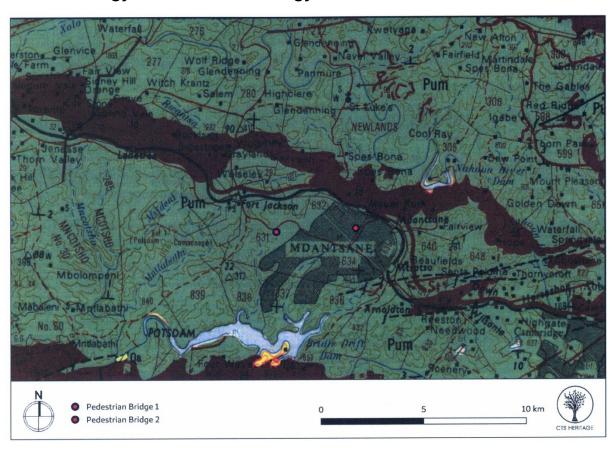


Figure 2: Geological map of the area around Mdantsane, approximately 15km northwest of East London. The two sites for the footbridges are indicated by black dots. Abbreviations of the rock types are explained in Table 2. Map enlarged from the Geological Survey 1: 250 000 map 1986, 3226 King Williamstown.

Table 2: Explanation of symbols for the geological map and approximate ages (Barbolini et al., 2016; Johnson et al., 2006; Rubidge, 2005). SG = Supergroup; Fm = Formation.

Symbo I	Group/Formation	Lithology	Approximate Age
Jd	Jurassic	Dolerite dykes,	Jurassic, approx. 180
		intrusive	Ma
Pum	Middleton	Mudstones and	Late Permian
	Formation, Adelaide	sandstones	(Guadalupian-
	Subgroup, Beaufort		Lopingian) ca 260-256
	Group, Karoo SG.		Ma

## i. Project location and geological context

The site lies in the south eastern sector of the Karoo Basin and the sediments are the alternating mudrocks and sandstones of the very thick Middleton Formation, Adelaide Subgroup, lower Beaufort group, Karoo Supergroup. They are late Permian in age with younger intrusive Jurassicaged dolerite dykes occurring to the north and south of the town of Mdantsane (Figure 2, Table 2).

The Middleton Formation is part of the eastern foredeep basin and was deposited in the overfilled or non-marine phase (Catuneanu et al., 2005) and so comprises terrestrial deposits. There are numerous fining-upward cycles, abundant red mudrocks and sedimentary structures that indicate deposition under fluvial conditions (Johnson et al., 2006). Some of the lower strata probably represent a subaerial upper delta-plain environment and the generally finer grained materials are typical of meandering rather than braided rivers. Channel deposits are indicated by sandstones while overbank deposits are indicated by the mudstones (Johnson et al., 2006).

Intruding through these sediments are dolerite dykes that formed during the Jurassic Drakensberg basaltic eruptions.

## ii. Palaeontological context

Vertebrate fossils are fairly common in the Middleton Formation and have been used to subdivide the strata into biozones (Rubidge et al., 1995; Day et al., 2015). The lower part of the Middleton Formation is in the *Pristerognathus* Assemblage Zone, the middle part is in the *Tropidostoma* Assemblage Zone and the upper part in the *Cistecephalus* Assemblage Zone. Lists of genera composition for each of the Assemblage Zones are provided in Appendix A but in general the fauna is composed of anapsids (no temporal openings in the skull) and synapsids (single pair of lateral temporal skull openings; more like mammals). The common genera are *Pristerognathus*, *Diictodon*, *Tropidostoma*, *Cistecephalus*, *Aucalephalus* and *Oudenodon*.

Fossil plants also occur in the Middleton Formation and they are from the *Glossopteris* flora and include leaf impressions of *Glossopteris*, early gymnosperms, lycopds, sphenophytes, ferns and silicified wood (see list in Appendix A).

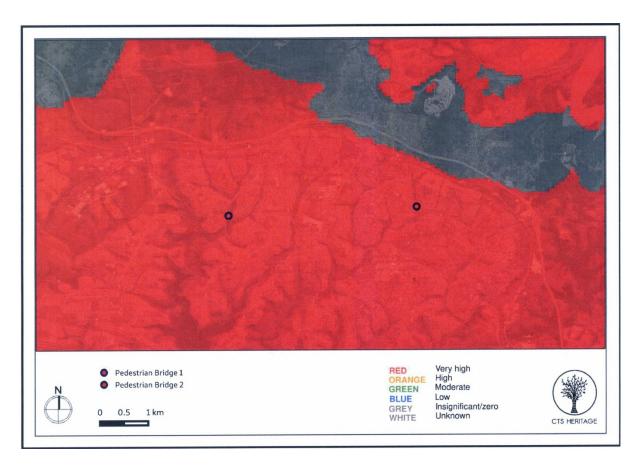


Figure 3: SAHRIS palaeosensitivity map for the site for the proposed footbridges in Mdantsane indicated by black dots. Colours indicate the following degrees of sensitivity: red = very highly sensitive; orange/yellow = high; green = moderate; blue = low; grey = insignificant/zero.

The area has been disturbed from previous urban and agricultural activities so any surface fossils are likely to be very weathered (naturally) or destroyed by previous activities. Along the streams there could be downcutting into underlying sediments that contain vertebrates or fossil plants (they are seldom found together). There is, however, a very small chance that fossil vertebrates or plants could be found where new excavations are made for the footbridge foundations.

From the SAHRIS map above the area is indicated as very highly sensitive (red; Figure 3) so a desktop assessment is being reported upon here. No fossils have been reported from the Mdantsane area but there is a small chance that fossil vertebrates or plant fragments could occur in the building area. Fossils are not likely to be seen on the land surface because of extensive weathering and previous agricultural or urban activities.

# 4. Impact assessment

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

TABLE 3A: CRITERIA FOR ASSESSING IMPACTS

PART A: DEFINITION AND CRITERIA				
	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.		
Criteria for ranking of the SEVERITY/NATURE of environmental	L	Minor deterioration (nuisance or minor deterioration). Change not measurable/ will remain in the current range. Recommended level will never be violated. Sporadic complaints.		
impacts	±	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.		
	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		
2010 trioit of impuoto	H	Permanent. Beyond closure. Long term.		
Criteria for ranking the	٦	Localised - Within the site boundary.		
SPATIAL SCALE of	М	Fairly widespread – Beyond the site boundary. Local		
impacts	H	Widespread – Far beyond site boundary. Regional/ national		
PROBABILITY	H	Definite/ Continuous		
(of exposure to	М	Possible/ frequent		
impacts)	L	Unlikely/ seldom		

#### **TABLE 3B: IMPACT ASSESSMENT**

PART B: ASSESSMENT			
	Н	-	
	М	-	
SEVERITY/NATURE	L	There is a small chance that fossil vertebrates or plants occur in the Middleton Fm sandstones and mudstones but any surface occurrences would have been disturbed by previous agricultural and urban activities. The impact would be very unlikely.	
	L+	-	
	M+	-	
	H+	-	
	L	-	
DURATION	М	-	
	Н	Where manifest, the impact will be permanent.	
SPATIAL SCALE	L	Since only the possible fossils within the area would be a variety of vertebrates or fossil plants from the <i>Glossopteris</i> flora in the mudstones and sandstones, the spatial scale will be localised within the site boundary.	
	М	-	
	Н	-	

PART B: ASSESSMENT			
	Н	-	
	М	-	
PROBABILITY	L	It is unlikely that any fossils would be found in the surface sediments but there may be vertebrate or plant fragments in the underlying mudstones. No surface fossils are likely to be found. Therefore 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. Underlying rocks of the Middleton Formation, Adelaide Subgroup, Beaufort Group, namely the mudstones, might preserve fossil vertebrates or plants but this will be evident once excavations commence. Although no fossils have been recorded from near Mdantsane there is a small chance that fossils from the upper Permian Middleton Formation may be disturbed so a Fossil Chance Find Protocol has been added to this report (Section 8). 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 dolomites, sandstones and mudstones are typical for the country and could contain fossil vertebrates or plant material. The Jurassic dolerite dykes would not preserve any 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 on the surface. There is a very small chance that fossil vertebrates or plant fragments may occur in the Middleton Formation mudstones so a Chance Find Protocol should be added to the EMPr: if fossils are found once excavations for foundations have commenced then they should be rescued and a palaeontologist called to assess and collect a representative sample, with a relevant permit from SAHRA or ECPHRA.

## 7. References

Anderson, J.M., Anderson, H.M., 1985. Palaeoflora of Southern Africa: Prodromus 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.

Catuneanu, O., Wopfner, H., Eriksson, P.G., Cairncross, B., Rubidge, B.S., Smith, R.M.H., Hancox, J.P., 2005. The Karoo basins of south-central Africa. Journal of African Earth Sciecnes 43, 211-253.

Day, M.O., Ramezani, J., Bowring, S.A., Sadler, P.M., Erwin, D.H., Abdala, F., Rubidge, B.S., 2015. When and how did the terrestrial mid-Permian mass extinction occur? Evidence from the tetrapod record of the Karoo Basin, South Africa. Proceedings of the Royal Society, London 282, 1-8.

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.

Rubidge, B.S., 2005. 27th Du Toit Memorial Lecture: re-uniting lost continents — fossil reptiles from the ancient Karoo and their wanderlust. South African Journal of Geology 108: 135-172.

Rubidge, B.S., Johnson, M.R., Kitching, J.W., Smith, R.M.H., Keyser, A.W., Groenewald, G.H., 1995. Biostratigraphy of the Beaufort group (Karoo supergroup). In: Biostratigraphic Series 1, South African Committee for Stratigraphy.

## 8. Chance Find Protocol

# Monitoring Programme for Palaeontology – to commence once the excavations for foundations for the footbridges and paths begin.

- 1. The following procedure is only required if fossils are seen on the surface and when 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 (plants, insects, wood, bone) should be put aside in a suitably protected place. This way the building 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 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/engineers 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 – Lists and Examples of upper Permian fossils

Middleton Fm / Pristerognathus Assemblage Zone (AZ)			
Group	Vertebrate Genera	Plant Genera (#	
		species)	
Captorhinida	Pareiasaurus	Mosses: Buthelezia (1)	
Eosuchia	Youngina	Sphenophytes:	
Dicynodontia	Tropidostoma	Sphenophyllum,	
	Endothiodon	Raniganjia,	
	Cistecephalus	Phyllotheca, Schizoneura	
	Pristerodon	(6)	
	Diictodon	Sphenopteris (1)	
	Emydops	Glossopteris: minimum:	
	Rachiocephalus	11 leaf types, 6	
Gorgonopsia	Gorgonops	fructifications	
	Lycaenops	Cordaitales:	
	Cyonosaurus	Noeggerathiopsis (1)	
Therocephalia	Ictidosuchoides	Conifers?: <i>Taeniopteris</i> ,	
	Ictidosuchops	Pagiophyllum,	
		Benlightfootia (3)	
		Australoxylon (1)	
		Prototaxoxylon (1)	

Middleton Fm / Tropidostoma AZ				
Group	Vertebrate Genera	Plant Genera (# species)		
Captorhinida	Pareiasaurus	Mosses: Buthelezia (1)		
Eosuchia	Youngina	Sphenophytes:		
Dicynodontia	Tropidostoma Endothiodon Cistecephalus Pristerodon Diictodon Emydops Rachiocephalus	Sphenophyllum, Raniganjia, Phyllotheca, Schizoneura (6) Sphenopteris (1) Glossopteris: minimum: 11 leaf types, 6		
Gorgonopsia	Gorgonops Lycaenops Cyonosaurus	fructifications Cordaitales: Noeggerathiopsis (1)		
Therocephalia	Ictidosuchoides Ictidosuchops	Conifers?: Taeniopteris, Pagiophyllum, Benlightfootia (3) Australoxylon (1) Prototaxoxylon (1)		
Middleton Fm/Cistece	phalus AZ			
Captorhinida	Pareiasaurus Anthodon Owenetta	Conifer woods: Agathoxylon ( 2 ), Australoxylon (1)		
Eosuchia	Youngina	,		
Dicynodontia	Endothiodon Cistecephalus Pristerodon Diictodon Emydops Aulacacephalodon Rachiocephalus Platycyclops Oudenodon Dinanomodon			
Gorgonopsia	Gorgonops Arctognathus Lycaenops Cyonosaurus Prorubidgea Rubidgea Dinogorgon Clelandina			
Therocephalia	Ictidosuchoides Ictidosuchops			

Table 4: Lists of fossil vertebrates and plants that have been recorded from the Middleton formation, Adelaide Subgroup, Beaufort Group, Karoo Supergoup of South Africa. (Source: Anderson and Anderson, 1985; Rubidge et al., 1995).

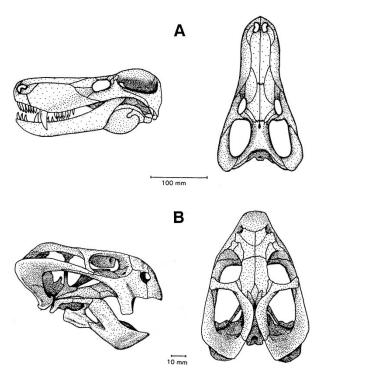


Figure 4: Pristerognathus (A) and Diictodon (B) (from Rubidge et al., 1995)

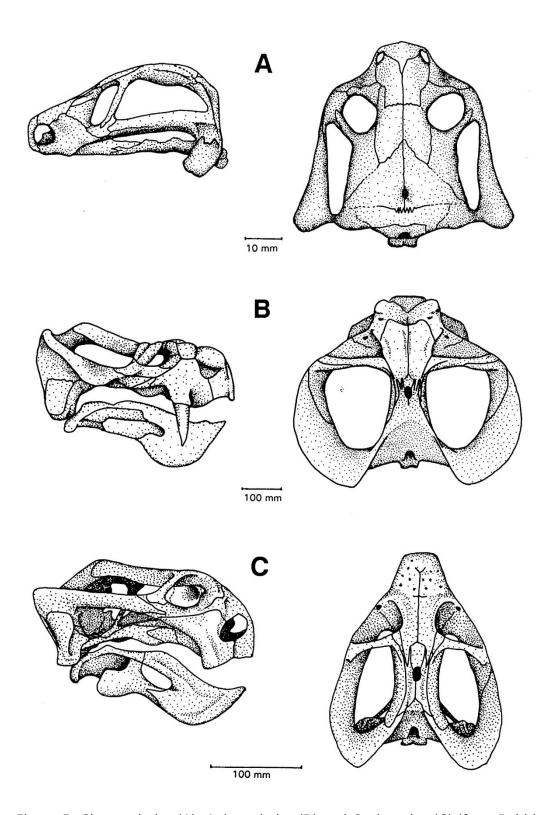


Figure 5: Cistecephalus (A), Aulacephalus (B) and Oudenodon (C) (from Rubidge et al., 1995).

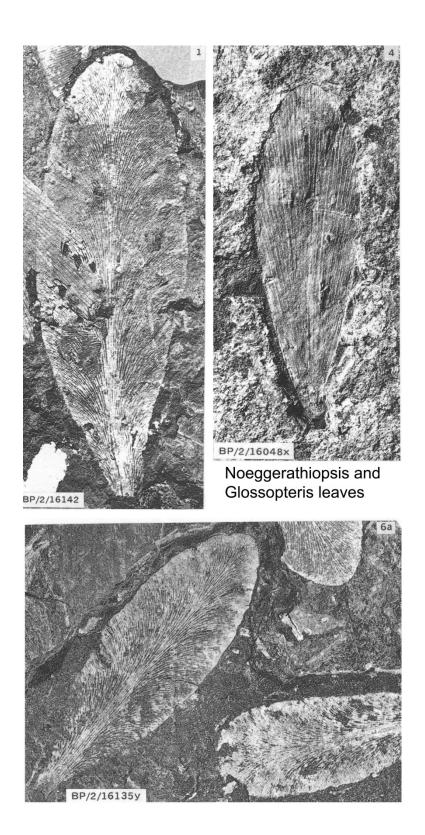


Figure 6: Fossil plants from the Ecca Group.

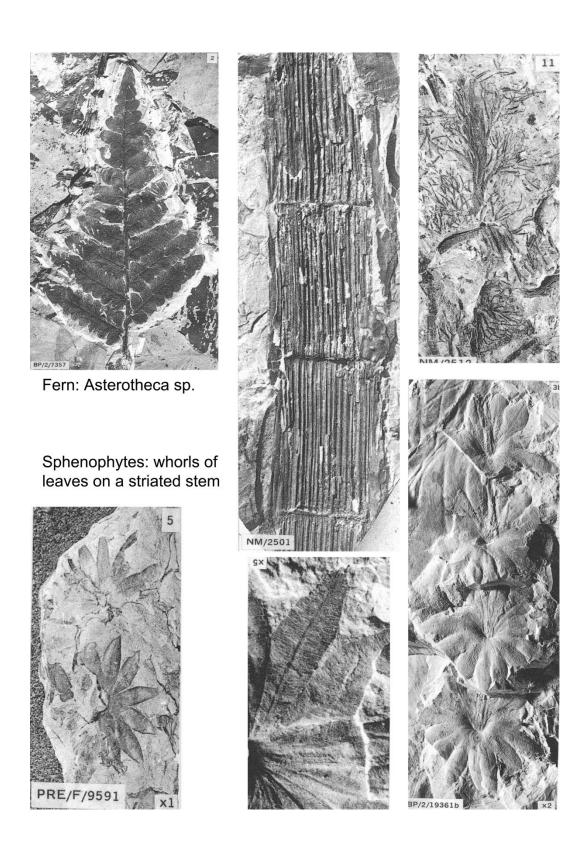


Figure 7: More examples of fossil plants from the Ecca Group.

Appendix B – Details of specialist

# 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

1986-1989: 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

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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 IP 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

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## 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 = 30;

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)