

**Palaeontological Impact Assessment for the
proposed Battery Energy Storage System, on
Farm Doornrandje 386 JR, Pretoria Rural,
Gauteng Province**

Site Visit Report (Phase 2)

For

Beyond Heritage

04 March 2022

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Expertise of Specialist

The Palaeontologist Consultant: Prof Marion Bamford

Qualifications: PhD (Wits Univ, 1990); FRSSAf, ASSAf

Experience: 33 years research; 25 years PIA studies

Declaration of Independence

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

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

Signature:

Executive Summary

A Palaeontological Impact Assessment was requested for the proposed Battery Energy Storage System (BESS) on Portion 111 (A Portion of 19) of the Farm Doornrandje 386JR in Pretoria Rural. The site is located approximately 10km north east of Lanseria Airport in Gauteng 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 site visit (Phase 2) Palaeontological Impact Assessment (PIA) was completed for the proposed development.

The proposed site lies on the potentially very highly fossiliferous rocks of the Malmani Subgroup, (Chuniespoort Group, Transvaal Supergroup), particularly the Monte Christo Formation. The site visit and walkthrough by the archaeologists for this project found that there were good exposures of dolomite but no stromatolites were present. Nonetheless, 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 developer/ environmental officer/ other designated responsible person once excavations/drilling activities have commenced. As far as the palaeontology is concerned, the project should be authorised.

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1. Background

Gridflex is proposing to establish a Battery Energy Storage System (BESS) facility as part of the IPP programme - specifically for emergency power. The proposed facility will generate approximately ~200MW / 800MWh. The proposed BESS facility will be established on a property which falls under the Crocodile River Reserve Doornrandje Cluster.

The primary purpose of the environmental scoping of the proposed BESS facility is to identify potential environmental red flags or fatal flaws in terms of development suitability associated with baseline environmental conditions.

The preferred site is located on the corner of the northern part of the farm boundary. It has been identified as the preferred location as it is lower lying resulting in less intrusive development; and potential exists for an alternative access from a non-operational gate after the Base 4 property. The preferred option for the evacuation of power is connection through a new 275kV transmission line from power plant to the Lamond Substation within existing 275kV servitude (Figures 1, 2).

The BESS facility will therefore require a Scoping and EIA application prior to commencement of construction activities and operation, requiring a total 10-13 month timeframe. Careful examination of the environmental and legislative implications of the project has not indicated any likely major constraints or fatal flaws to the project. In order to ensure the success of the project the various applications, engagements and studies will need to follow legal due process. The success of the project also requires BESS to ensure that specialist / supporting studies are properly scoped and implemented in accordance with legal requirements, international good practice and potential lender E&S requirements.

The BESS project is proposed to be undertaken on Portion 111 (A Portion of 19) of the Farm Doornrandje 386J.R in Pretoria Rural. The site is located approximately 10km north east of Lanseria Airport and 8.1 km north of Diepsloot at the Geographical Coordinates 25°51'49.78"S 27°59'41.61"E. Access to the site is off the R511 (approximately 1.2km east of the site) onto Gemstone Road. The site is approximately 68 hectares and previously used for agricultural activities.

According to the geological and SAHRIS maps (Figures 3 and 4), the site lies on potentially very highly fossiliferous rocks of the Malmani Subgroup, therefore, 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 site visit and walkthrough (Phase 2) 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
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
c ii	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
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
n ii	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

	A specialist report prepared in terms of the Environmental Impact Regulations of 2017 must contain:	Relevant section in report
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 if any comments that were received during any consultation process	N/A
q	Any other information requested by the competent authority.	N/A

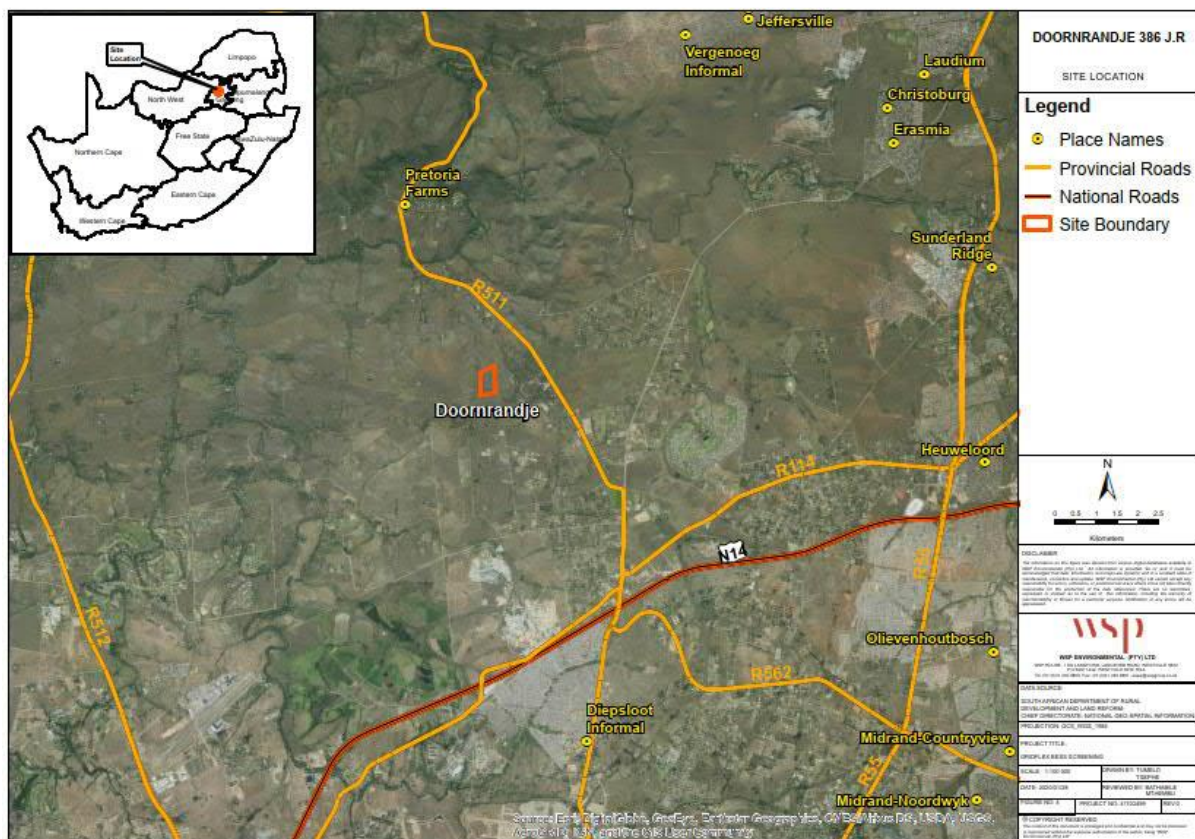


Figure 1: Google Earth map of the proposed development showing the relevant land marks.

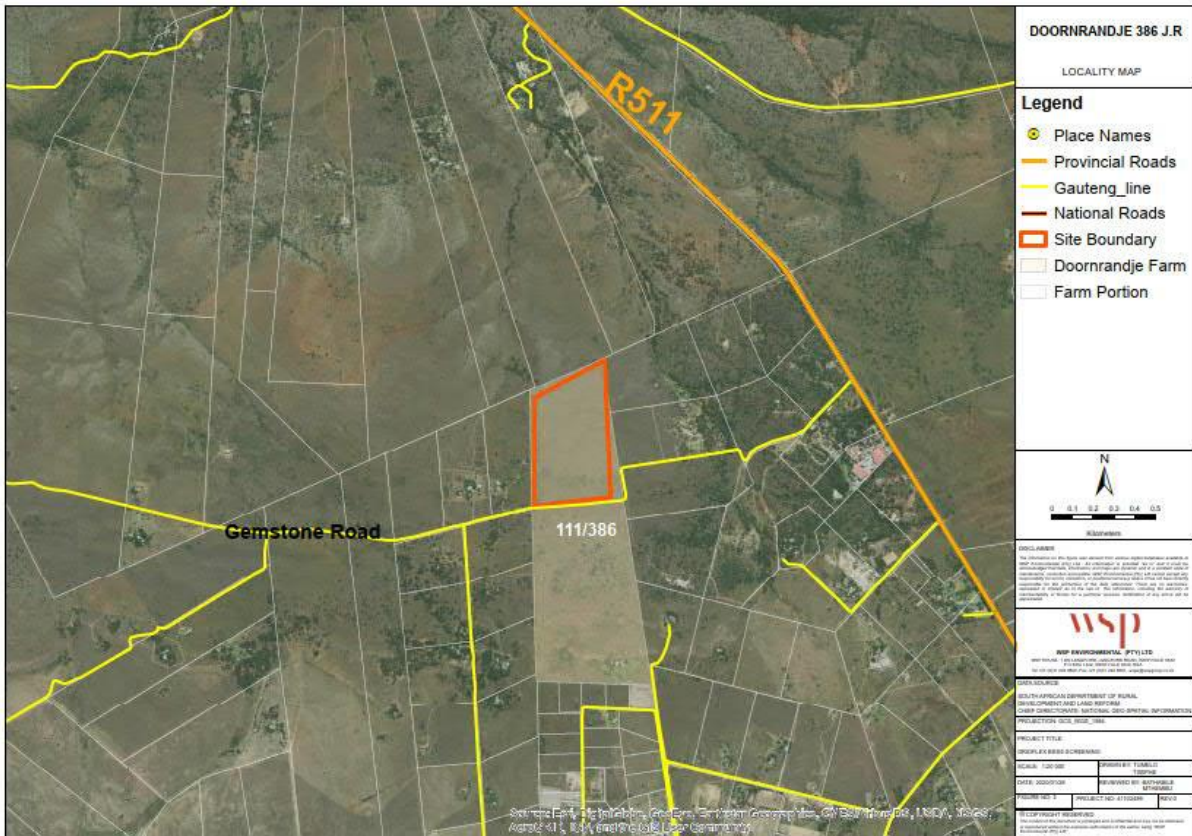


Figure 2: Google Earth map of the proposed BESS site on Farm Doornrandje 386 JR shown within the orange outline.

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, as is the case here;
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

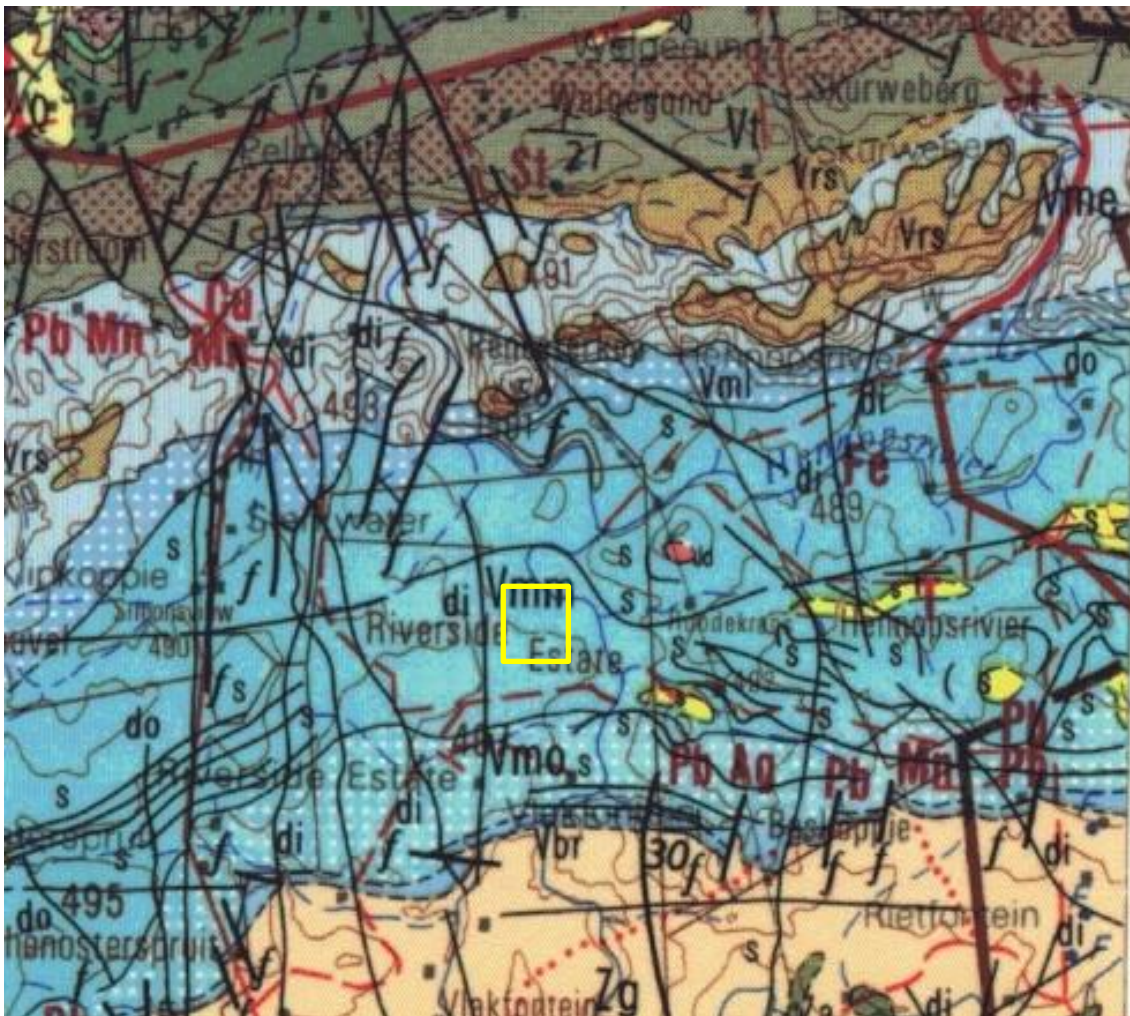


Figure 3: Geological map of the area around the BESS site. The location of the proposed project is indicated within the yellow rectangle. Abbreviations of the rock types are explained in Table 2. Map enlarged from the Geological Survey 1: 250 000 map 2527 Rustenburg.

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

Symbol	Group/Formation	Lithology	Approximate Age
Qs	Quaternary	Alluvium, sand, calcrete	Neogene, ca 2.5 Ma to present
Vml	Littleton Fm, Malmani Subgroup, Chuniespoort Group, Transvaal SG	Dark chert-poor dolomite	Ca 2585 – 2480 Ma
Vmm	Monte Christo Fm, Malmani Subgroup,	Chert-rich dolomite; circles = oolitic	Ca 2585 – 2480 Ma

Symbol	Group/Formation	Lithology	Approximate Age
	Chuniespoort Group, Transvaal SG		
Vmo	Oaktree Fm, Malmani Subgroup, Chuniespoort Group, Transvaal SG	Dark chert-free dolomite	Ca 2585 – 2480 Ma
Vbr	Black Reef Fm, Transvaal SG	Quartzite, conglomerate, shale	<2618 Ma

The Late Archaean to early Proterozoic Transvaal Supergroup is preserved in three structural basins on the Kaapvaal Craton (Eriksson et al., 2006). In South Africa are the Transvaal and Griqualand West Basins, and the Kanye Basin is in southern Botswana. The Griqualand West Basin is divided into the Ghaap Plateau sub-basin and the Prieska sub-basin. Sediments in the lower parts of the basins are very similar but they differ somewhat higher up the sequences. Several tectonic events have greatly deformed the south western portion of the Griqualand West Basin between the two sub-basins

The Transvaal Supergroup comprises one of world's earliest carbonate platform successions (Beukes, 1987; Eriksson et al., 2006; Zeh et al., 2020). In some areas there are well preserved stromatolites that are evidence of the photosynthetic activity of blue green bacteria and green algae. These microbes formed colonies in warm, shallow seas.

In the Transvaal Basin the Transvaal Supergroup is divided into two Groups, the lower Chuniespoort Group and the upper Pretoria Group (with ten formations; Eriksson et al., 2006). The Chuniespoort Group is divided into the basal Malmani Subgroup that comprises dolomites and limestones and is divided into five formations based on chert content, stromatolitic morphology, intercalated shales and erosion surfaces. The top of the Chuniespoort Group has the Penge Formation and the Deutschland Formation.

The Malmani Subgroup is up to 2000m thick and has been divided into five formations based on the composition of cherts, stromatolites, limestones and shales. At the base, overlying the Black Reef Formation, is the base is the Oaktree Formation that represents a transition from siliciclastic sedimentation to platform carbonates (Eriksson et al., 2006). It is composed of carbonaceous shales, stromatolitic dolomites and locally developed quartzites. Next is the **Monte Christo Formation** that has an erosive breccia base and continues with stromatolitic and oolitic platform dolomites. Above that is the Lyttleton Formation that is composed of shales, quartzites and stromatolitic dolomites. The overlying Eccles Formation includes a series of cherty dolomites and erosion breccias that locally contain gold deposits. This mineralisation has been attributed to hydrothermal remobilisation of fluids by the Bushveld complex (Eriksson et al., 2006). The topmost formation is the Frisco Formation that is composed mainly of stromatolitic dolomites but these become more shale rich towards the top of the sequence because of the deepening depositional environment.

ii. Palaeontological context

The palaeontological sensitivity of the area under consideration is presented in Figure 3, with the Monte Christo and Oaktree Formations of the Malmani Subgroup indicated as very highly sensitive (red) because of the potential of finding trace fossils, in particular stromatolites.

Stromatolites are the trace fossils that were formed by colonies of green algae and blue-green algae (Cyanobacteria) that grew in warm, shallow marine settings. These algae were responsible for releasing oxygen via the photosynthetic process where atmospheric carbon dioxide and water, using energy from the sun, are converted into carbon chains and compounds that are the building blocks of all living organisms. The released carbon dioxide initially was taken up by the abundant reducing minerals to form oxides, e.g. iron oxide. Eventually free oxygen was released into the atmosphere and some was converted into ozone by the bombardment of cosmic rays. The ozone is critical for the filtering out of harmful ultraviolet rays.

Stromatolites are the layers upon layers of inorganic materials that were deposited during photosynthesis, namely calcium carbonate, magnesium carbonate, calcium sulphate and magnesium sulphate. These layers can be in the form of flat layers, domes or columns depending on the environment where they grew (Beukes, 1987). Some environments did not form stromatolites, just layers of limestone that later was converted to dolomite. The algae that formed the stromatolites are very rarely preserved, and they are microscopic so they can only be seen from thin sections studies under a petrographic microscope.

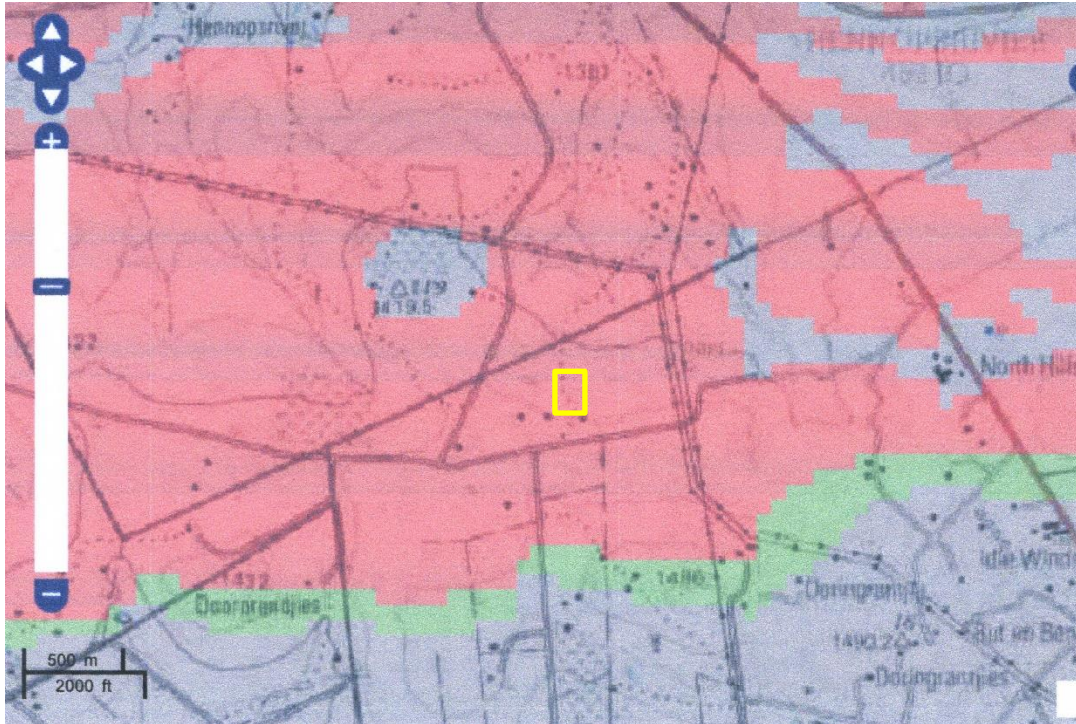


Figure 4: SAHRIS palaeosensitivity map for the site for the proposed BESS facility shown within the yellow rectangle. Background colours indicate the following degrees of sensitivity: red = very highly sensitive; orange/yellow = high; green = moderate; blue = low; grey = insignificant/zero.

iii. Site visit observations

A site visit was carried out by the archaeologist and many photographs were taken by him (Figure 5).



Figure 5: Site visit photographs for the BESS facility. Note the generally flat topography and absence of rocky outcrops. No fossils were seen on any section of the site.

Summary of observations:

The site was visited in summer so there was good grass cover but there were no rocky outcrops or exposures of dolomite or stromatolites.

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		
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	Quaternary soils and sands do not preserve plant fossils; Malmani Subgroup dolomites might preserve trace fossils such as stromatolites. The site visit confirmed that there were no stromatolites.. The impact would be negligible.
	L	-
	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 trace fossils such as stromatolites, the spatial scale will be localised within the site boundary.
	M	-
	H	-
PROBABILITY	H	-
	M	-
	L	The site visit showed that there are no surface stromatolites, but they might be present below the surface. 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. The geological structures suggest that the rocks are the correct age and type to preserve fossils. The site visit and walk through confirmed that there were NO FOSSILS in the project footprint. Furthermore, the material to be excavated is soils and sand and these do not preserve fossils. Since there is an extremely small chance that trace fossils may occur below ground and 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 trace fossils such as stromatolites. The site visit and walk through at the end of February by the archaeologist confirmed that there are NO FOSSILS such as stromatolites in the project footprint, in the solar collecting area or along the proposed grid connection. The sands of the Quaternary period would not preserve fossils.

6. Recommendation

Based on the fossil record but confirmed by the site visit and walk through there are NO FOSSILS such as stromatolites in the exposed dolomites, even though fossils have been recorded from rocks of a similar age and type in South Africa. It is extremely unlikely that any fossils would be preserved in the overlying soils and sands of the Quaternary. There is a very small chance that fossils may occur in below the ground surface in the dolomites of the Oaktree and Monte Christo Formations, (Malmani Subgroup, Chuniespoort Group, Transvaal Supergroup) 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 and drilling have commenced, then they should be rescued and a palaeontologist called to assess and collect a representative sample.

7. References

Beukes, N.J., 1987. Facies relations, depositional environments and diagenesis in a major early Proterozoic stromatolitic carbonate platform to basinal sequence, Campbellrand Subgroup, Transvaal Supergroup, southern Africa. *Sedimentary Geology* 54, 1-46.

Eriksson, P.G., Altermann, W., Hartzler, F.J., 2006. The Transvaal Supergroup and its precursors. 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 237-260

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.

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 (trace fossils, fossils of plants, insects, bone or coalified material) 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 8). 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 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 Malmani Subgroup

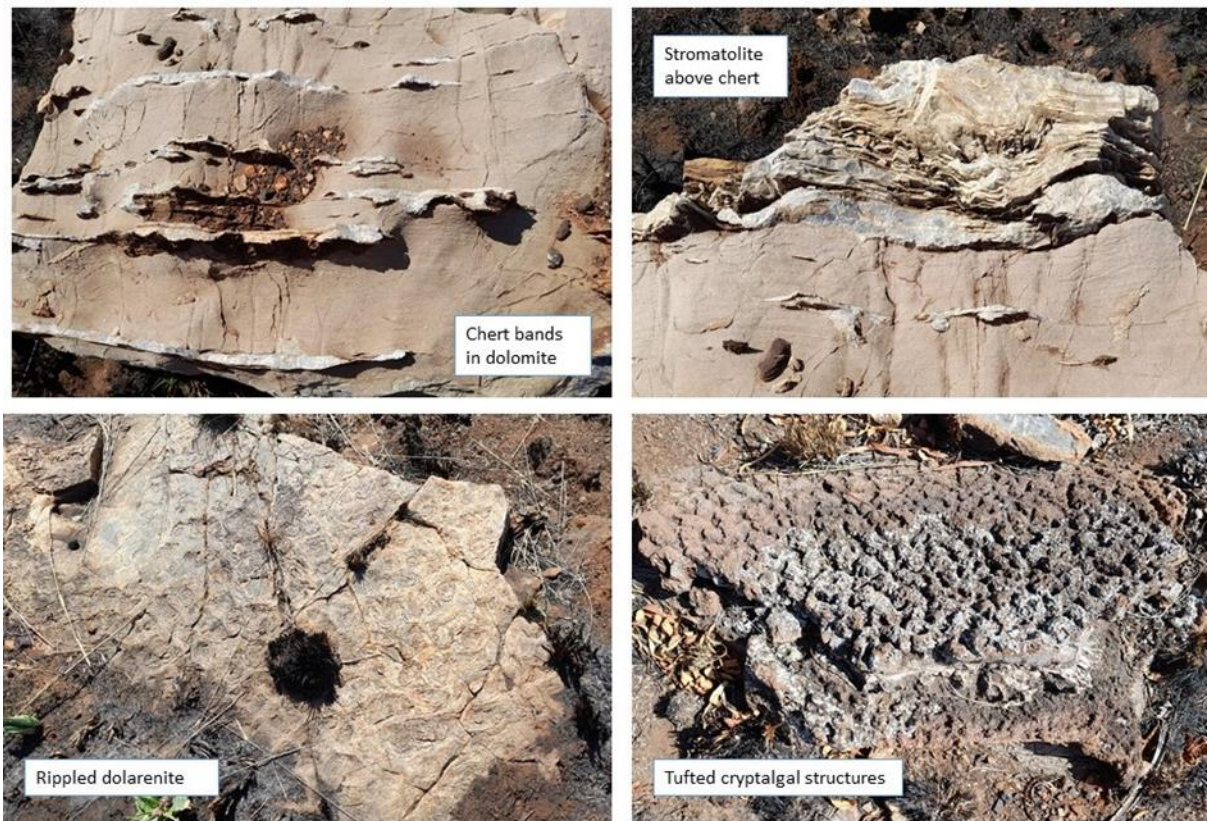


Figure 8: Photographs of different types of stromatolites in dolomite.

10. Appendix B – Details of specialists

Marion Bamford (PhD) **Short CV for PIAs – Jan 2022**

I) Personal details

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
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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
 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	11	0
Masters	12	4
PhD	11	4
Postdoctoral fellows	12	2

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 12 - 20 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 –
 Associate Editor: Cretaceous Research: 2018-2020
 Associate Editor: Royal Society Open: 2021 -
 Review of manuscripts for ISI-listed journals: 25 local and international journals

x) Palaeontological Impact Assessments

Selected from recent project only – list not complete:

- 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
- 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 2021 for AHSA

Xi) Research Output

Publications by M K Bamford up to January 2022 peer-reviewed journals or scholarly books: over 160 articles published; 5 submitted/in press; 10 book chapters.

Scopus h-index = 30; Google Scholar h-index = 36; i10-index = 95

Conferences: numerous presentations at local and international conferences.