



PALAEONTOLOGICAL
DESKTOP ASSESSMENT

PROPOSED CARBON DIOXIDE STORAGE PROJECT NEAR LEANDRA IN MPUMALANGA

RFP No: ZA-CGS-287283-CS-CQS

MAY 2023

COMPILED FOR: NEMAI

ENVIRONMENTAL



Declaration of Independence

I, Elize Butler, declare that -

General declaration:

- I act as the independent palaeontological specialist in this application
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favorable to the applicant
- I declare that there are no circumstances that may compromise my objectivity in performing such work.
- I have expertise in conducting palaeontological impact assessments, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity.
- I will comply with the Act, Regulations, and all other applicable legislation.
- I will take into account, to the extent possible, the matters listed in section 38 of the NHRA when preparing the application and any report relating to the application.
- I have no, and will not engage in, conflicting interests in the undertaking of the activity.
- I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing any decision to be taken with respect to the application by the competent authority; and the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority.
- I will ensure that information containing all relevant facts in respect of the application is distributed or made available to interested and affected parties and the public and that participation by interested and affected parties is facilitated in such a manner that all interested and affected parties will be provided with a reasonable opportunity to participate and to provide comments on documents that are produced to support the application.
- I will provide the competent authority with access to all information at my disposal regarding the application, whether such information is favorable to the applicant or not
- All the particulars furnished by me in this form are true and correct.
- I will perform all other obligations as expected a palaeontological specialist in terms of the Act and the constitutions of my affiliated professional bodies; and
- I realize that a false declaration is an offense in terms of regulation 71 of the Regulations and is punishable in terms of section 24F of the NEMA.



Disclosure of Vested Interest

I do not have and will not have any vested interest (either business, financial, personal, or other) in the proposed activity proceeding other than remuneration for work performed in terms of the Regulations.

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SIGNATURE:



This Palaeontological Impact Assessment report has been compiled considering the National Environmental Management Act 1998 (NEMA) and Environmental Impact Regulations 2014 as amended, requirements for specialist reports, Appendix 6, as indicated in the table below.

Table 1: Checklist for Specialist studies conformance with Appendix 6 of the EIA Regulations of 2014 (as amended)

Requirements of Appendix 6 - GN R326 EIA		Comment where not
Regulations of 7 April 2017	Relevant section in report	applicable.
1.(1) (a) (i) Details of the specialist who prepared	Page ii and Section 2 of	-
the report	Report – Contact details	
	and company and Appendix	
	А	
(ii) The expertise of that person to compile a	Section 2 – refer to	-
specialist report including a curriculum vitae	Appendix A	
(b) A declaration that the person is	Page ii of the report	-
independent in a form as may be specified		
by the competent authority		
(c) An indication of the scope of, and the	Section 4 – Objective	-
purpose for which, the report was		
prepared		
(cA) An indication of the quality and age of	Section 5 – Geological and	-
base data used for the specialist report	Palaeontological history	
(cB) a description of existing impacts on the	Section 9	-
site, cumulative impacts of the proposed		
development and levels of acceptable		
change;		
(d) The duration, date and season of the site		Desktop
investigation and the relevance of the		Assessment
season to the outcome of the assessment		
(e) a description of the methodology adopted	Section 7 Approach and	-
in preparing the report or carrying out the	Methodology	
specialised process inclusive of		
equipment and modelling used		
(f) details of an assessment of the specific	Section 1 and 10	
identified sensitivity of the site related to		
the proposed activity or activities and its		
associated structures and infrastructure,		
inclusive of a site plan identifying site		
alternatives;		



Requirements of Appendix 6 - GN R326 EIA		Comment where not
Regulations of 7 April 2017	Relevant section in report	applicable.
(g) An identification of any areas to be	Section 5	No buffers or areas
avoided, including buffers		of sensitivity
		identified
(h) A map superimposing the activity	Section 5 – Geological and	
including the associated structures and	Palaeontological history	
infrastructure on the environmental		
sensitivities of the site including areas to		
be avoided, including buffers;		
(i) A description of any assumptions made	Section 7.1 – Assumptions	-
and any uncertainties or gaps in	and Limitation	
knowledge;		
(j) A description of the findings and potential	Section 1 and 10	
implications of such findings on the		
impact of the proposed activity, including		
identified alternatives, on the environment		
(k) Any mitigation measures for inclusion in	Section 1 and 10	
the EMPr		
(I) Any conditions for inclusion in the	Section 1 and 10	
environmental authorisation		
(m) Any monitoring requirements for	Section 1 and 10	
inclusion in the EMPr or environmental		
authorisation		
(n)(i) A reasoned opinion as to whether the	Section 1 and 10	
proposed activity, activities or portions		
thereof should be authorised and		
(n)(iA) A reasoned opinion regarding the		
acceptability of the proposed activity or		
activities; and		
(n)(ii) If the opinion is that the proposed	Section 1 and 10	-
activity, activities 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		
	<u> </u>	l



Requirements of Appendix 6 - GN R326 EIA		Comment where not
Regulations of 7 April 2017	Relevant section in report	applicable.
(o) A description of any consultation	N/A	
process that was undertaken during the		
course of carrying out the study		
(p) A summary and copies if any comments	N/A	
that were received during any consultation		
process		
(q) Any other information requested by the	N/A	
competent authority.		
(2) Where a government notice by the Minister	Section 3 compliance with	
provides for any protocol or minimum	SAHRA guidelines	
information requirement to be applied to a		
specialist report, the requirements as indicated in		
such notice will apply.		



EXECUTIVE SUMMARY

Banzai Environmental was appointed by NEMAI Environmental to conduct the Palaeontological Desktop Assessment (PDA) to assess the proposed Pilot Carbon Dioxide Storage Project near Leandra, in Govan Mbeki Local Municipality within the in Gert Sibande District Municipality, Mpumalanga Province, South Africa. To comply with the National Heritage Resources Act (No 25 of 1999, section 38) (NHRA), this PIA is necessary to verify if fossil material could potentially be present in the planned development area and to evaluate the potential impact of the proposed development on the Palaeontological Heritage of the area.

The surface geology on the Geological Map as well as the updated geology indicates that the proposed development is underlain by the Karoo Dolerite Suite. The PalaeoMap of the South African Heritage Resources Information System (SAHRIS) indicates that the Palaeontological Sensitivity of the Karoo dolerite Suite is Zero as it is igneous in origin and thus unfossiliferous (Almond and Pether, 2009; Almond *et al.*, 2013). However, the Geotechnical report of the development indicates that the study area is at depth underlain by the Ventersdorp Supergroup. SAHRIS indicates that the Ventersdorp Supergroup has a Moderate Palaeontological Sensitivity

A Moderate Palaeontological Significance has been allocated to the development footprint. It is therefore considered that the proposed development will not lead to detrimental impacts on the palaeontological resources of the area. The construction and operation of the project may be authorised, as the whole extent of the development footprint is not considered sensitive in terms of palaeontological heritage. If fossil remains or trace fossils are discovered during any phase of construction, either on the surface or exposed by excavations the Environmental Control Officer (ECO) in charge of these developments must report to SAHRA (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za) so that mitigation can be carry out by a palaeontologist.

It is consequently recommended that no further palaeontological heritage studies, ground truthing and/or specialist mitigation are required pending the discovery of newly discovered fossils.



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1 INTRODUCTION

Coal is the major energy source in South Africa and responsible for a great part of Carbon Dioxide emissions. According to the World Bank data, in 2015, energy production from coal sources accounted for 92.7% of the total electricity produced in South Africa (World Bank, 2022c) and more recently, coal comprised 65% of the primary energy supply in 2018 (Mineral Resources & Energy Department, 2021). With more than two-thirds of energy generation capacity based on coal resources, the largest is produced within Mpumalanga Province (Council for Geoscience, 2021).

Furthermore, in 2019 the CO2 emissions (in metric tons per capita) recorded a value of 7.6, which is in line with the values that have been recorded since 2015 (World Bank, 2022d) and placing South Africa as the top CO2 emitter on the African continent and one of the top emitters globally.

On the other hand, the Climate Policy of South Africa is rooted in the principles of the United Nations Framework Convention on Climate Change (UNFCCC) and its Kyoto Protocol and has ratified the Paris Agreement.

Therefore, the Government is committed to reducing CO2 emissions up to 50% in the next 10 years and to enable a sustainable transition toward a low-carbon economy (Council for Geoscience, 2021). Despite being the leading CO₂ emitter, one of the country's commitments is the **implementation of climate changes mitigation measures** (Mwakasonda & Winkler, 2005).

The Carbon Capture, Utilization, and Storage has been recognized as one of the technologies to mitigate the emissions of carbon dioxide into the atmosphere - in particular within areas with a large coal reliance (like Mpumalanga) - and forms one of the **Nationally Appropriate Mitigation Actions** (Council for Geoscience, 2022).

At the present stage of technological development, the South African economy is supported by large scale coal-based energy system, being one of the largest coal producers globally (Dhansay, et al., 2022).

In this context of an inevitably CO₂ emissive energy production matrix, the Republic of South Africa established a set of Nationally Appropriate Mitigation Actions (NAMA) to minimize greenhouse gas emissions. These measures are aligned with the targeted measures to reduce CO₂ emissions by more than half in the next 10 years (Dhansay, et al., 2022). The NAMA include the possibility of Carbon Capture, Utilization, and Storage (CCUS). CCUS is one tool for a just transition to a low-carbon energy system, by storing CO₂ that would otherwise accumulate in the atmosphere in suitable deep geological formations.

6

The Council for Geoscience has been mandated to provide for the promotion of research and the extension of knowledge in the field of geoscience, as well as the provision of specialised geoscientific services. Therefore, possible geological storage options have been explored as a technological possibility of Carbon Capture and Storage.

Specifically, the stated purpose of the CCS Project is the assessment and the demonstration of the application of CCS technology to South African conditions and build technical capacity. Given that the power supply can sometimes be inconsistent, the Project is exploring off-grid energy options such as batteries and generators.

Generally, the northeast of South Africa is the region with the most coal reserves and thus where the most of CO_2 emissions occur, highlighting the presence of intensive mining and petrochemical industrial activities, being thus a potential region for the CCUS implementation. Additionally, although the CCUS investigations typically consider the deep saline aquifers, relatively deep coal seams, and depleted oil and gas fields as potential storage reservoirs, more recently assessments and investigations are being carried out into the possible CO2 storage in basaltic sequences of the Ventersdorp Supergroup (Dhansay, et al., 2022). By gathering these characteristics (presence of mining and petrochemical industrial activities and a basaltic geological nature) the Mpumalanga Province, was identified as suitable for the implementation of the present Project.

CO₂ Capture, and Storage is a technically feasible method, studied over the years, for reducing carbon dioxide emissions from sources such as combustion of fossil fuels, as in power generation, and the preparation of fossil fuels, as in natural-gas processing (IPCC, 2005).

Overall, the technology is based on the utilization or storage of CO2 in suitable deep geological formations, leading to a reduction in the anthropogenic release of CO2 into the atmosphere. The process includes three key stages:

- 1) Capturing CO2 from anthropogenic sources;
- 2) Transportation to the injection site;
- 3) Permanent geological storage or utilization of the CO2.

The present Project is a test of this application, considering the storage (Council for Geoscience, 2022).

With the purpose of assessing the Project environmental and social risks and impacts and "the feasibility of and to build expert capacity for carbon capture and storage" (Council for Geoscience, 2022) overall,



the Project activities include the site establishment, drilling and construction of injection well of approximately 1,800 metres, road transportation, and operation/injection of CO2 at the designated site.

CO2 Capture Site

One of the key points of the Project is the definition of the site for capturing CO2 from an anthropogenic source. As a result, a pilot of a capture plant has been defined at the **Sasol Secunda Station** to test capture technology and be a Centre of excellence to train operators for the future commercialization phase (Kamrajh, Hicks, & Dhansay, 2022).

Activities

Once the site location is settled and, considering the goals presented in Section 2.2, being characterized as a **research Project** for the development of a **Pilot CO2 Storage Project**, the Project is divided into the following activities:

- Site establishment;
- Drilling;
- Construction of injection well to a depth of approximately 1,800 m;
- Operation injection of CO2 at the designated site.

Along with the phases defined above, further activities should be considered: Stakeholder Engagement; Securing of the Area (fencing to be installed along the implementation area); Environmental Baseline Monitoring.

The Project is expected to be developed over **2.5 years**, considering 6 months for the construction phase and 24 months for the operational phase.

Within the construction phase, drilling (the main activity taking place), will be carried out 24 hours a day. Regarding the operational phase, carried out 16 hours a day (where the CCS technology is tested) it is noted that the injection activity will, over the two years, operate 250 or 365 days per year. This frequency will help reach the final injection target.



Figure 1: Regional locality of the proposed Carbon Dioxide Storage Project near Leandra, in Mpumalanga.

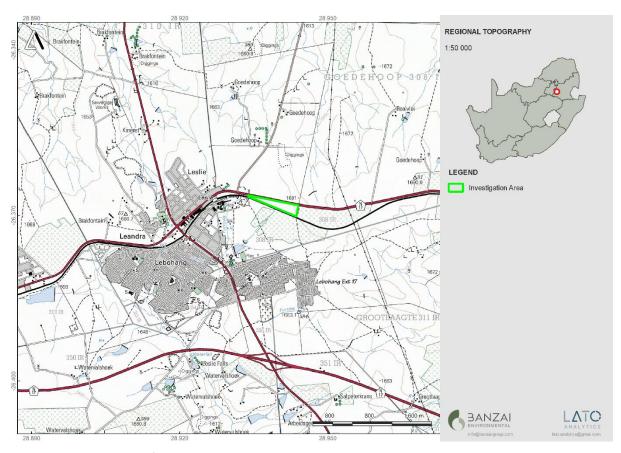


Figure 2: Locality map of the proposed Carbon Dioxide Storage Project near Leandra, in Mpumalanga.

2 QUALIFICATIONS AND EXPERIENCE OF THE AUTHOR

This present study has been conducted by Mrs Elize Butler. She has conducted approximately 300 palaeontological impact assessments for developments in the Free State, KwaZulu-Natal, Eastern, Central, and Northern Cape, Northwest, Gauteng, Limpopo, and Mpumalanga. She has an MSc (*cum laude*) in Zoology (specializing in Palaeontology) from the University of the Free State, South Africa and has been working in Palaeontology for more than twenty-five years. She has experience in locating, collecting, and curating fossils. She has been a member of the Palaeontological Society of South Africa (PSSA) since 2006 and has been conducting PIAs since 2014.

3 LEGISLATION

3.1 National Heritage Resources Act (25 of 1999)

Cultural Heritage in South Africa, includes all heritage resources, is protected by the National Heritage Resources Act (Act 25 of 1999) (NHRA). Heritage resources as defined in Section 3 of the Act include "all



objects recovered from the soil or waters of South Africa, including archaeological and palaeontological objects and material, meteorites and rare geological specimens".

The identification, evaluation and assessment of any cultural heritage site, artefact or finds in the South African context is required and governed by the following legislation:

- National Environmental Management Act (NEMA) Act 107 of 1998
- National Heritage Resources Act (NHRA) Act 25 of 1999
- Minerals and Petroleum Resources Development Act (MPRDA) Act 28 of 2002
- Notice 648 of the Government Gazette 45421- general requirements for undertaking an initial site sensitivity verification where no specific assessment protocol has been identified.

The next section in each Act is directly applicable to the identification, assessment, and evaluation of cultural heritage resources.

GNR 982 (Government Gazette 38282, 14 December 2014) promulgated under the National Environmental Management Act (NEMA) Act 107 of 1998

- Basic Assessment Report (BAR) Regulations 19 and 23
- Environmental Impacts Assessment (EIA) Regulation 23
- Environmental Scoping Report (ESR) Regulation 21
- Environmental Management Programme (EMPr) Regulations 19 and 23

National Heritage Resources Act (NHRA) Act 25 of 1999

- Protection of Heritage Resources Sections 34 to 36
- Heritage Resources Management Section 38

MPRDA Regulations of 2014

Environmental reports to be compiled for application of mining right – Regulation 48

- Contents of scoping report Regulation 49
- Contents of environmental impact assessment report Regulation 50
- Environmental management programme Regulation 51
- Environmental management plan Regulation 52

The NEMA (No 107 of 1998) states that an integrated EMP should (23:2 (b)) "...identify, predict, and evaluate the actual and potential impact on the environment, socio-economic conditions, and cultural heritage".

In agreement with legislative requirements, EIA rating standards as well as SAHRA policies the following comprehensive and legally compatible PIA report have been compiled.



Palaeontological heritage is exceptional and non-renewable and is protected by the NHRA. Palaeontological resources and may not be unearthed, broken moved, or destroyed by any development without prior assessment and without a permit from the relevant heritage resources authority as per section 35 of the NHRA.

This Palaeontological Impact assessment forms part of the Heritage Impact Assessment (HIA) and adhere to the conditions of the Act. According to Section 38 (1), an HIA is required to assess any potential impacts to palaeontological heritage within the development footprint where:

- the construction of a road, wall, power line, pipeline, canal or other similar form of linear development or barrier exceeding 300 m in length.
- the construction of a bridge or similar structure exceeding 50 m in length.
- any development or other activity which will change the character of a site—
- (Exceeding 5 000 m² in extent; or
- involving three or more existing erven or subdivisions thereof; or
- involving three or more erven or divisions thereof which have been consolidated within the past five years; or
- the costs of which will exceed a sum set in terms of regulations by SAHRA or a provincial heritage resources authority
- the re-zoning of a site exceeding 10 000 m² in extent.
- or any other category of development provided for in regulations by SAHRA or a Provincial heritage resources authority.

4 OBJECTIVE

The aim of a Palaeontological Impact Assessment (PIA) is to decrease the effect of the development on potential fossils at the development site.

According to the "SAHRA APM Guidelines: Minimum Standards for the Archaeological and Palaeontological Components of Impact Assessment Reports" the purpose of the PIA is: 1) to identify the palaeontological importance of the rock formations in the footprint; 2) to evaluate the palaeontological magnitude of the formations; 3) to clarify the impact on fossil heritage; and 4) to suggest how the developer might protect and lessen possible damage to fossil heritage.

The palaeontological status of each rock section is calculated as well as the possible impact of the development on fossil heritage by a) the palaeontological importance of the rocks, b) the type of development and c) the quantity of bedrock removed.



When the development footprint has a moderate to high palaeontological sensitivity a field-based assessment is necessary. The desktop and the field survey of the exposed rock determine the impact significance of the planned development and recommendations for further studies or mitigation are made. Destructive impacts on palaeontological heritage usually only occur during the construction phase while the excavations will change the current topography and destruct or permanently seal-in fossils at or below the ground surface. Fossil Heritage will then no longer be accessible for scientific research.

Mitigation usually precede construction or may occur during construction when potentially fossiliferous bedrock is exposed. Mitigation comprises the collection and recording of fossils. Preceding excavation of any fossils a permit from SAHRA must be obtained and the material will have to be housed in a permitted institution. When mitigation is applied correctly, a positive impact is possible because our knowledge of local palaeontological heritage may be increased

The terms of reference of a PIA are as follows:

General Requirements:

- Adherence to the content requirements for specialist reports in accordance with Appendix 6 of the EIA Regulations 2014, as amended.
- Adherence to all applicable best practice recommendations, appropriate legislation, and authority requirements.
- Submit a comprehensive overview of all appropriate legislation, guidelines.
- Description of the proposed project and provide information regarding the developer and consultant who commissioned the study.
- Description and location of the proposed development and provide geological and topographical maps.
- Provide Palaeontological and geological history of the affected area.
- Identification sensitive areas to be avoided (providing shapefiles/kml's) in the proposed development.
- Evaluation of the significance of the planned development during the Pre-construction,
 Construction, Operation, Decommissioning Phases and Cumulative impacts. Potential impacts should be rated in terms of the direct, indirect, and cumulative:
 - a. **Direct impacts** are impacts that are caused directly by the activity and generally occur at the same time and at the place of the activity.
 - b. **Indirect impacts** of an activity are indirect or induced changes that may occur as a result of the activity.



- c. Cumulative impacts result from the incremental impact of the proposed activity on a common resource when added to the impacts of other past, present or reasonably foreseeable future activities.
- Fair assessment of alternatives (infrastructure alternatives have been provided):
- Recommend mitigation measures to minimise the impact of the proposed development; and
- Implications of specialist findings for the proposed development (such as permits, licenses etc).

5 GEOLOGICAL AND PALAEONTOLOGICAL HISTORY

The surface geology of the Carbon Dioxide Storage project in Mpumalanga is indicated on the 1:250 000 East Rand 2628 (1986) Geological Map (Council for Geosciences, Pretoria) (**Figure 3, Table 2**). This map as well as the updated geology (**Figure 4**) indicates that the proposed development is underlain by the Jurassic Karoo dolerite Suite.

The PalaeoMap of the South African Heritage Resources Information System (SAHRIS) indicates that the Palaeontological Sensitivity of the Karoo Dolerite Suite is Zero as it is igneous in origin and thus unfossiliferous (Almond and Pether, 2009; Almond *et al.*, 2013) (**Figure 5**).

The Karoo igneous province is one of the worlds classic continental basalt (CFB) provinces. This province consists of intrusive and extrusive rocks that occur over a large area (Duncan et al, 2006). Generally, the flood basalts do not contribute to prominent volcanic structures, but instead are formed by successive eruptions from a set of fissures that form sub-horizontal lava flows (sills and dykes) varying in thickness. This lava caps the landscape on which they erupted. As the Karoo is an old flood basalt province it is today preserved as erosional fragments of a more extensive lava cap that covered much of southern Africa in the geological past. It is estimated that the Karoo lava outcrop currently covered at least 140 000 km² while it was larger in the past [~2 000 000 km² (Cox 1970, 1972)].

The Karoo Igneous Province contains a large volume of flood basalts as well as silicic volcanic rocks. These units are comprised of rhyodacite and rhyolitic magma and crops out along the Lebombo monocline. Individual units span up to 60 km and sometimes show massive pyroclastic structures and are thus classified as rheoignimbrites. The basal lavas lie conformable on the Clarens Formation but in specific localities sandstone erosion occurred before the volcanic eruptions took place. Lock *et al* (1974) found evidence in the Eastern Cape that in the early stages of volcanism magma interacted with ground water to produce volcaniclastic deposits as well as phreatic and phreatomagmatic diatremes. Eales *et al* (1984) also found evidence of aqueous environments during early volcanism by the existence of pillow lavas and associated hyaloclastite breccias and thin lenses of fluviatile sandstones interbedded with the lowermost magmas. The Karoo Igneous Province can be divided into the Lebombo Group and the Drakensberg Group (Table 3).



The study area is located in the Evander sub-Basin (Witwatersrand Basin) (Tweedie, 1986; Witthüser *et al.*, 2015). The Geotechnical report of the proposed Carbon Dioxide Storage Project indicates the developments is at depth underlain by the Ventersdorp Supergroup. The study states ... "that there are no exposures of pre-Karoo geology of the Evander Basin and that outcrops are limited to the Ecca Group, Karoo Supergroup, and Karoo dolerite"....and that "available geological information is largely based on borehole intersections and underground mapping by various authors and mining companies (Tweedie, 1986; McCarthy, 2006; Witthüser, et al., 2015, Harmony Gold Mining Company, 2009)"...

The Ventersdorp Supergroup comprise of the biggest and most wide-spread system of volcanic rocks in the Kaapvaal Craton (Van der Westhuizen al, 2006). This Supergroup unconformably overlies the Witwatersrand Supergroup and is also unconformably overlain by the Transvaal Supergroup. The elliptical basin is approximately 300 000km² in extent.

The best exposures of the Ventersdorp Supergroup are in the North West Province as well as in the Northern Cape Province, Gauteng, and southern Botswana. This Supergroup is divided in the Klipriviersberg Group (oldest and present in the proposed development footprint) which is overlain by the Platberg Group followed by the sedimentary Bothaville Formation and the volcanic Allanridge Formation (uppermost Ventersdorp unit, youngest Formation)

The Platberg Group is subdivided in four formations namely the Kameeldoorns-, Goedgenoeg-, Makwassie-, and Rietgat Formations. These formations consist of heterogenous rock varying from chemical and classic sediments, to felsic and mafic volcanics. These rocks were deposited in linear vault troughs during grabed developments (Visser et al, 1975-1976, Buck, 1980). These deep intermontane grabens formed in older underlying andesitic terranes and formed areas of alluvial fan deposits and debris as well as scree flows. Ooids and stromatolites accumulated under lacustrine conditions in fine-grained chemical and terrigenous sediments. (Buck, 1980) Stromatolites were identified in the Rietgat Formation between Prieska and Britstown. In time fluvial processes prevailed causing widespread prograding of alluvial fans across basins (Buck, 1980).

The Platberg is mostly absent in the north-east of the Ventersdorp depository while the outcrops are erratic with changes in thickness. The type-area of the Platberg Group is between Welkom and Klerksdorp and was described by Winter (1976), while the Klerksdorp area was described by J.M. Myers (1990). The Rietgat Formation crops out in the, north, northwest, and southwest of Vryburg, south-southeast of Douglas, Taungs-Hartswater area, west of Klerksdorp, T'Kuip in the Northern Cape Province and southwest of Ventersdorp. The Rietgat Formation consist of alternating sedimentary and volcanic rocks which varies in thickness across the basin.

The uppermost volcanic Allanridge Formation crops out in the North West, Northern Cape, and Free State Provinces. Witmer (1976) came to the conclusion that the Allanridge Formation has a conformable relationship with the Bothaville Formation (deeper parts of the basin) while Keyser (1998), found a very BANZAI ENVIRONMENTAL (PTY) LTD.

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prominent unconformable relationship in the direction of the northwestern boundary of the Ventersdorp depository. The Allanridge formations consists primary of light green—grey porphyritic lava and pyroclastic rocks as well as dark-green amygdaloidal lava. The dark-green lava is the thickest unit in the Allanridge Formation. Both lava types consist of amygdales but is more widespread in the dark-green lava. The Allanridge is igneous in origin and thus unfossiliferous.



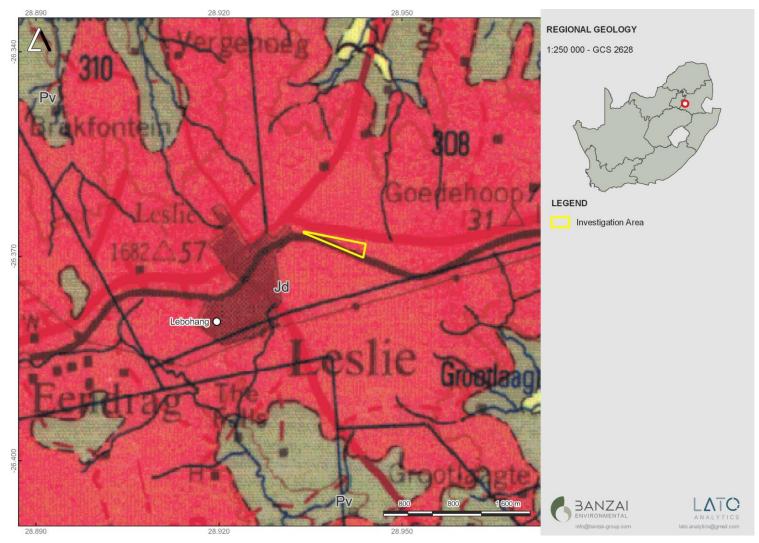
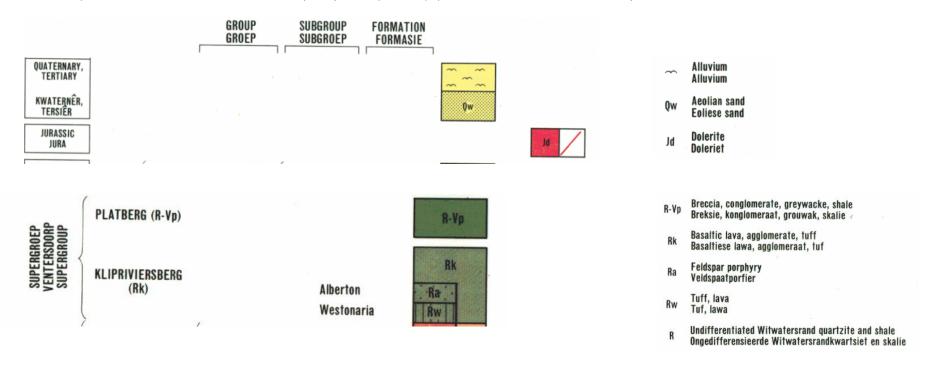


Figure 3: Extract of the 1:250 000 East Rand 2628 (1986) Geological Map (Council for Geosciences, Pretoria) indicates that the study area is underlain by the Jurassic Karoo Dolerite Suite (Jd, red).



Table 2: Legend of the 1:250 000 East Rand 2628 (1986) Geological Map (Council for Geosciences, Pretoria)





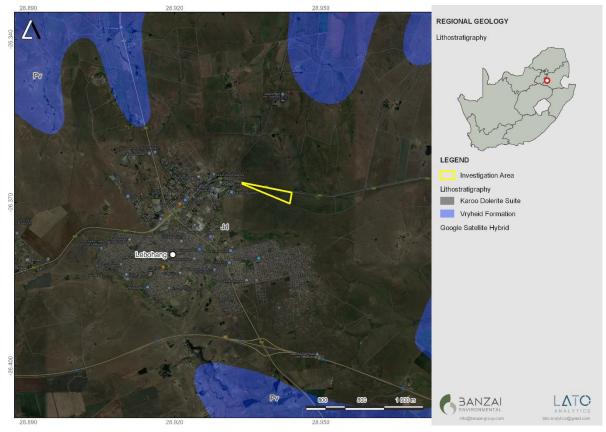


Figure 4: Updated geology indicates that the proposed development near Leandra in Mpumalanga is underlain by the Karoo Dolerite Suite.



Table 3: Formal stratigraphic units of the Karoo Igneous Province

Karoo Igneous Province			
Drakensberg Group	p	Lebombo Group	
Formation Rock Type		Formation	Rock Type
		Movene	Basalt
		Mbuluzi	Rholite
		Jozini	Rhyodacite
Lesotho	Basalt	Sabie River	Basalt
Barkley East	Basalt	Letaba	Picritic basalt
	1	Mashikri	Nephelinite

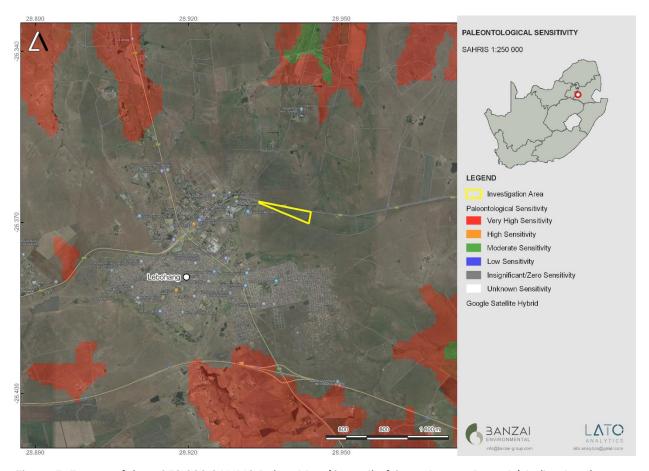


Figure 5: Extract of the 1:250 000 SAHRIS PalaeoMap (Council of Geosciences, Pretoria) indicating the proposed development near Leandra in Mpumalanga.



According to the SAHRIS Palaeosensitivity map (Figure 5) the proposed development is underlain by sediments of a Zero (grey) Palaeontological Sensitivity.

Table 4: Palaeontological Sensitivity

Colour	Sensitivity	Required Action
RED	VERY HIGH	Field assessment and protocol for finds is required
ORANGE/YELLOW	HIGH	desktop study is required and based on the outcome of
		the desktop study; a field assessment is likely
GREEN	MODERATE	desktop study is required
BLUE	LOW	no palaeontological studies are required however a
		protocol for finds is required
GREY	INSIGNIFICANT/ZERO	no palaeontological studies are required
WHITE/CLEAR	UNKNOWN	these areas will require a minimum of a desktop study.
		As more information comes to light, SAHRA will
		continue to populate the map.



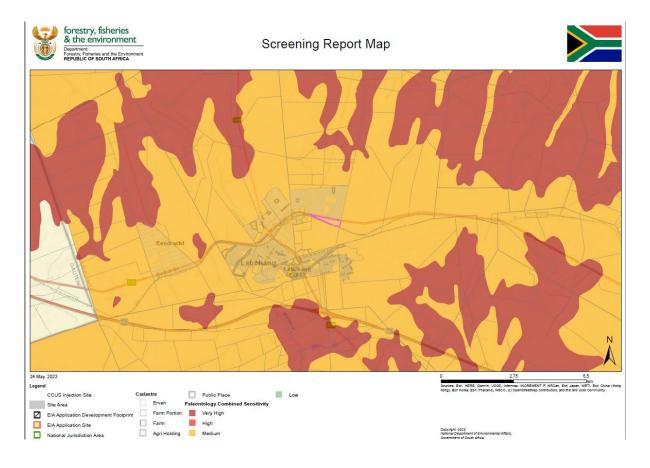


Figure 6: Palaeontological Sensitivity generated by the National Environmental Web-Based Screening Tool indicating the Carbon Dioxide Storage Project near Leandra in Mpumalanga

The National Environmental Web-Based Screening Tool indicates that the proposed development has a medium Palaeontological Sensitivity. This contradicts the Palaeontological Sensitivity on the SAHRIS PalaeoMap (Figure 5).

6 GEOGRAPHICAL LOCATION OF THE SITE

The study area is located in Leandra (Govan Mbeki Local Municipality, Gert Sibande District Municipality, Mpumalanga Province, South Africa (Figure 1-2).

Table 5:Property coordinates

Latitude	Longitude
-26.366304	28.933773
-26.368118	28.943966
-26.370033	28.943483
-26.366608	28.933906



7 METHODS

The aim of a desktop study is to evaluate the risk to palaeontological heritage in the proposed development. This includes all trace fossils and fossils. All available information is consulted to compile a desktop study and includes Palaeontological impact assessment reports in the same area, aerial photos, and Google Earth images, topographical as well as geological maps. Scientific research articles of research conducted in the area is also sourced and included in the Impact Assessment.

7.1 Assumptions and Limitations

When conducting a PIA several factors can affect the accuracy of the assessment. The focal point of geological maps is the geology of the area, and the sheet explanations were not meant to focus on palaeontological heritage. Many inaccessible regions of South Africa have not been reviewed by palaeontologists and data is generally based on aerial photographs. Locality and geological information of museums and universities databases have not been kept up to date or data collected in the past have not always been accurately documented.

Comparable Assemblage Zones in other areas is used to provide information on the existence of fossils in an area which was not yet been documented. When similar Assemblage Zones and geological formations for Desktop studies is used it is generally **assumed** that exposed fossil heritage is present within the footprint.

8 ADDITIONAL INFORMATION CONSULTED

In compiling this report the following sources were consulted:

- Geological map 1:100 000, Geology of the Republic of South Africa (Visser 1984).
- A Google Earth map with polygons of the proposed development was obtained from Nemai Environmental
- 1:250 000 East Rand 2628 (1986) Geological Map (Council for Geosciences, Pretoria
- Council for Geosciences. Environmental and Social Impact Assessment for the Pilot Carbon Dioxide Storage Project
- Bunk, J. Geotechnical report for the CO₂ storage in the Ventersdorp Supergroup, Mpumalanga,
 South Africa
- Updated geology produced by the Council of Geosciences (Pretoria).

9 IMPACT ASSESSMENT METHODOLOGY

PLEASE NOTE: Both alternatives of the Altina PV Project are located in the development footprint. As such, these alternatives have the same impact as they have the same geology. From a Palaeontological view no alternative is more preferred above the other.



Impact assessment must take account of the nature, scale, and duration of impacts on the environment whether such impacts are positive or negative. Each impact is also assessed according to the following project phases:

- · Construction.
- · Operation; and
- · Decommissioning.

Where necessary, the proposal for mitigation or optimisation of an impact should be detailed. A brief discussion of the impact and the rationale behind the assessment of its significance should also be included. The rating system is applied to the potential impacts on the receiving environment and includes an objective evaluation of the mitigation of the impact. In assessing the significance of each impact, the following criteria is used:

Table 6: The rating system

NATU	NATURE		
The N	The Nature of the Impact is the possible destruction of fossil heritage		
GEOG	GRAPHICAL EXTENT		
Thisi	s defined as the area over which the	he impact will be experienced.	
1	Site	The impact will only affect the site.	
2	Local/district	Will affect the local area or district.	
3	Province/region	Will affect the entire province or region.	
4	International and National	Will affect the entire country.	
PROE	PROBABILITY		
This describes the chance of occurrence of an impact.			
1	Unlikely	The chance of the impact occurring is extremely low (Less than a 25% chance of occurrence).	
2	Possible	The impact may occur (Between a 25% to 50% chance of occurrence).	
3	Probable	The impact will likely occur (Between a 50% to 75% chance of occurrence).	



4	Definite	Impact will certainly occur (Greater than a 75% chance of
		occurrence).
DUR	ATION	
This	deceribee the duration of the	imports Durstian indicates the lifetime of the import on a result of
	roposed activity.	e impacts. Duration indicates the lifetime of the impact as a result of
ille p	roposed activity.	
1	Short term	The impact will either disappear with mitigation or will be
		mitigated through natural processes in a span shorter than
		the construction phase (0 – 1 years), or the impact will last
		for the period of a relatively short construction period and
		a limited recovery time after construction, thereafter it will
		be entirely negated (0 – 2 years).
2	Medium term	The impact will continue or last for some time after the
		construction phase but will be mitigated by direct human
		action or by natural processes thereafter (2 - 10 years).
3	Long term	The impact and its effects will continue or last for the
J	Long term	entire operational life of the development, but will be
		mitigated by direct human action or by natural processes
		thereafter (10 – 30 years).
		therearter (10 00 years).
4	Permanent	The only class of impact that will be non-transitory.
		Mitigation either by man or natural process will not occur
		in such a way or such a time span that the impact can be
		considered indefinite.
INTE	NSITY/ MAGNITUDE	
Desc	ribes the severity of an impa	act.
1	Low	Impact affects the quality, use and integrity of the
		system/component in a way that is barely perceptible.
2	Medium	Impact alters the quality, use and integrity of the
		system/component but system/component still
		continues to function in a moderately modified way and
		maintains general integrity (some impact on integrity).
3	High	Impact affects the continued viability of the system/
		component and the quality, use, integrity and functionality
		of the system or component is severely impaired and may
	 ENVIDONIMENTAL (DTV) TD	



		temporarily cease. High costs of rehabilitation and remediation.	
4	Very high	Impact affects the continued viability of the system/component and the quality, use, integrity and functionality of the system or component permanently ceases and is irreversibly impaired. Rehabilitation and remediation often impossible. If possible rehabilitation and remediation often unfeasible due to extremely high costs of rehabilitation and remediation.	
REVERS	SIBILITY		
	This describes the degree to which an impact can be successfully reversed upon completion of the proposed activity.		
1	Completely reversible	The impact is reversible with implementation of minor mitigation measures.	
2	Partly reversible	The impact is partly reversible but more intense mitigation measures are required.	
3	Barely reversible	The impact is unlikely to be reversed even with intense mitigation measures.	
4	Irreversible	The impact is irreversible, and no mitigation measures exist.	
IRREPLA	IRREPLACEABLE LOSS OF RESOURCES		
This describes the degree to which resources will be irreplaceably lost as a result of a proposed activity.			
1	No loss of resource	The impact will not result in the loss of any resources.	
2	Marginal loss of resource	The impact will result in marginal loss of resources.	
3	Significant loss of resources	The impact will result in significant loss of resources.	

CUMULATIVE EFFECT

Complete loss of resources

This describes the cumulative effect of the impacts. A cumulative impact is an effect which in itself may not be significant but may become significant if added to other existing or potential impacts emanating from other similar or diverse activities as a result of the project activity in question.

The impact is result in a complete loss of all resources.



1	Negligible cumulative impact	The impact would result in negligible to no cumulative
		effects.
2	Low cumulative impact	The impact would result in insignificant cumulative effects.
3	Medium cumulative impact	The impact would result in minor cumulative effects.
4	High cumulative impact	The impact would result in significant cumulative effects

SIGNIFICANCE

Significance is determined through a synthesis of impact characteristics. Significance is an indication of the importance of the impact in terms of both physical extent and time scale, and therefore indicates the level of mitigation required. The calculation of the significance of an impact uses the following formula:

(Extent + probability + reversibility + irreplaceability + duration + cumulative effect) x magnitude/intensity = X.

The summation of the different criteria will produce a non-weighted value. By multiplying this value with the magnitude/intensity, the resultant value acquires a weighted characteristic which can be measured and assigned a significance rating.

Points	Impact significance rating	Description
6 to 28	Negative low impact	The anticipated impact will have negligible negative effects and will require little to no mitigation.
6 to 28	Positive low impact	The anticipated impact will have minor positive effects.
29 to 50	Negative medium impact	The anticipated impact will have moderate negative effects and will require moderate mitigation measures.
29 to 50	Positive medium impact	The anticipated impact will have moderate positive effects.
51 to 73	Negative high impact	The anticipated impact will have significant effects and will require significant mitigation measures to achieve an acceptable level of impact.
51 to 73	Positive high impact	The anticipated impact will have significant positive effects.



74 to 96	Negative very high impact	The anticipated impact will have highly significant effects
		and are unlikely to be able to be mitigated adequately.
		These impacts could be considered "fatal flaws".
74 to 96	Positive very high impact	The anticipated impact will have highly significant positive

9.1 Summary of Impact Tables

Loss of fossil heritage will be a negative impact. Only the site will be affected by the proposed development. The expected duration of the impact is assessed as potentially permanent to long term. In the absence of mitigation procedures, the damage or destruction of any palaeontological materials will be permanent. Impacts on palaeontological heritage during the construction phase could potentially occur and are regarded as having a Low probability. As fossil heritage will be destroyed the impact is irreversible. The significance of the impact occurring will be Zero.

Table 7: Summary of Impact Tables

Site	Probability	Duration	Magnitude	Reversibility	Irreplicable Loss	Cumulative Effect	Significance
1	1	4	1	4	4	2	16

10 FINDINGS AND RECOMMENDATIONS

The surface geology on the Geological Map as well as the updated geology indicates that the proposed development is underlain by the Karoo Dolerite Suite. The PalaeoMap of the South African Heritage Resources Information System (SAHRIS) indicates that the Palaeontological Sensitivity of the Karoo dolerite Suite is Zero as it is igneous in origin and thus unfossiliferous (Almond and Pether, 2009; Almond et al., 2013). However, the Geotechnical report of the development indicates that the study area is at depth underlain by the Ventersdorp Supergroup. SAHRIS indicates that the Ventersdorp Supergroup has a Moderate Palaeontological Sensitivity

A Moderate Palaeontological Significance has been allocated to the development footprint. It is therefore considered that the proposed development will not lead to detrimental impacts on the palaeontological resources of the area. The construction and operation of the project may be authorised, as the whole



extent of the development footprint is not considered sensitive in terms of palaeontological heritage. If fossil remains or trace fossils are discovered during any phase of construction, either on the surface or exposed by excavations the Environmental Control Officer (ECO) in charge of these developments must report to SAHRA (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za) so that mitigation can be carry out by a palaeontologist.

It is consequently recommended that no further palaeontological heritage studies, ground truthing and/or specialist mitigation are required pending the discovery of newly discovered fossils.

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Appendix A CURRICULUM VITAE

ELIZE BUTLER

PROFESSION: Palaeontologist

YEARS' EXPERIENCE: 30 years in Palaeontology

EDUCATION: B.Sc Botany and Zoology, 1988

University of the Orange Free State

B.Sc (Hons) Zoology, 1991

University of the Orange Free State

Management Course, 1991

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M. Sc. Cum laude (Zoology), 2009

University of the Free State

Dissertation title: The postcranial skeleton of the Early Triassic non-mammalian Cynodont *Galesaurus* planiceps: implications for biology and lifestyle

MEMBERSHIP

Palaeontological Society of South Africa (PSSA) 2006-currently

EMPLOYMENT HISTORY

Part-time Laboratory assistant Department of Zoology & Entomology

University of the Free State Zoology 1989-

1992

Part-time laboratory assistant Department of Virology

University of the Free State Zoology 1992

Research Assistant National Museum, Bloemfontein 1993 – 1997

Principal Research Assistant National Museum, Bloemfontein

and Collection Manager 1998–2022



TECHNICAL REPORTS

Butler, E. 2014. Palaeontological Impact Assessment of the proposed development of private dwellings on portion 5 of farm 304 Matjesfontein Keurboomstrand, Knysna District, Western Cape Province, Bloemfontein.

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