

**Palaeontological Impact Assessment for the
proposed Kareerand BESS, Solar facility and Grid
connection, east of Buffelsfontein,
North West Province**

Desktop Study (Phase 1)

For

Beyond Heritage (Pty) Ltd

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Expertise of Specialist

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Declaration of Independence

This report has been compiled by Professor Marion Bamford, of the University of the Witwatersrand, sub-contracted by Beyond Heritage (Pty) Ltd, 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 that reads "MKBamford". The signature is written in a cursive style and is positioned above a horizontal line.

Signature:

Executive Summary

A Palaeontological Impact Assessment was requested for the proposed construction of a Battery Energy Storage System (BESS) and solar PV facility.

Kareerand BESS (Pty) Ltd ('the Applicant') is proposing the construction of the Kareerand Battery Energy Storage (BESS) Facility, consisting of a BESS and solar photovoltaic (PV) infrastructure located on Portion 3 of the Farm Kareerand No. 444, approximately 22 km east of Klerksdorp within the North West Province. In addition, the project entails an upgraded access road and a grid connection to the Eskom Hermes Main Transmission Station (MTS), north of Buffelsfontein.

To comply with the regulations of the South African Heritage Resources Agency (SAHRA) in terms of Section 38(8) of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) (NHRA), a desktop Palaeontological Impact Assessment (PIA) was completed for the proposed development.

The proposed BESS, PV site and upgraded access road lie on non-fossiliferous volcanic rocks so will have no impact on the palaeontology. The grid connection route close to the Hermes MTS is on potentially very highly sensitive dolomites of the Malmani Subgroup (Chuniespoort Group, Transvaal Supergroup) that might have trace fossils such as stromatolites or microbialites. Previous fieldwork in the area by this author found that there are no stromatolites in the area. 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 contractor, environmental officer or other designated responsible person once excavations, drilling or mining activities have commenced. There is no no-go area or route, no cumulative impact and no buffers required. Since the impact will be low, as far as the palaeontology is concerned, the project should be authorised.

ASPECT	SCREENING TOOL SENSITIVITY	VERIFIED SENSITIVITY	OUTCOME STATEMENT/ PLAN OF STUDY	RELEVANT SECTION MOTIVATING VERIFICATION
Palaeontology	Very High to Zero	Low to Zero	Paleontological Impact Assessment	Section 7.2. SAHRA Requirements

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1. Background

Kareerand BESS (Pty) Ltd ('the Applicant') is proposing the construction of the Kareerand Battery Energy Storage (BESS) Facility, consisting of a BESS and solar photovoltaic (PV) infrastructure located on Portion 3 of the Farm Kareerand No. 444, approximately 22 km east of Klerksdorp within the North West Province.

The Applicant is also proposing to upgrade the existing access road on Portion 3 of the Farm Kareerand No. 444, Portion 4 of the Farm Kareerand 444, Portion 16 of the Farm Kromdraai 420, Portion 17 of the Farm Kromdraai 420, Farm Umfula No. 575, Portion 20 of Farm Umfula No. 567 and Portion 56 of the Farm Kromdraai 420; and to construct new 132kV grid connection infrastructure on Portion 3 of the Farm Kareerand No. 444, Portion 15 of the Farm Kromdraai 443, Remainder of Portion 5 of Farm no. 422, Portion 6 of the Farm Buffelsfontein 443, Portion 3 of the Farm Kareerand 444, Portion 2 of the Farm Buffelsfontein 443, Portion 103 of the Farm Hartebeestfontein 422, Portion 38 of the Farm Hartebeestfontein 422, Portion 79 of the Farm Hartebeestfontein 422, Portion 8 of the Farm Hartebeestfontein 422, Portion 2 of the Farm Mapaiskraal No. 441, Portion 41 of the Farm Hartebeestfontein 422 and Portion 4 of the Farm Mapaiskraal 441.

The Kareerand BESS facility will have a total development footprint of up to approximately 25 ha and will have a maximum export capacity of up to 77 MW. The development area is situated within the City of Matlosana Local Municipality and the JB Marks Local Municipality. The site is accessible via existing tarred and gravel roads to the north-east of the site. These existing gravel roads will be upgraded to a maximum width of 8m (Figures 1-3)

The proposed Kareerand BESS facility will include the following infrastructure:

- PV modules and mounting structures (up to 10 ha).
- Inverters and transformers.
- Solid State Battery Energy Storage System (BESS) (up to 10 ha).
- Site and internal access roads (up to 8m wide).
- Operation and Maintenance buildings including a gate house and security building, control centre, offices, warehouses and workshops for storage and maintenance (up to 1 ha).
- Laydown areas (3 ha temporary and 1 ha permanent).
- A 132 kV facility substation (up to 1 ha).
- 33 kV cabling between the project components and the facility substation.

The project will also include Grid connection infrastructure consisting of:

- A 132 kV Eskom Switching Station (up to 1 ha).
- 132 kV powerline (up to 11.5 km long) connecting the Eskom switching station to the Hermes Main Transmission Substation (a grid connection corridor of 100m wide will be assessed to allow for environmental sensitivities and/or micro-siting).

The Grid connection infrastructure, although assessed cumulatively with the BESS, will be subject to a separate environmental application process administered by the provincial authority.

A Palaeontological Impact Assessment was requested for the Kareerand BESS and grid project. To comply with the regulations of the South African Heritage Resources Agency (SAHRA) in terms of Section 38(8) of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) (NHRA), a desktop Palaeontological Impact Assessment (PIA) was completed for the proposed development and is reported herein.

Table 1: National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) and Environmental Impact Assessment (EIA) Regulations, 2014 (as amended) - Requirements for Specialist Reports (Appendix 6).

	A specialist report prepared in terms of the Environmental Impact Regulations of 2017 must contain:	Relevant section in report
ai	Details of the specialist who prepared the report,	Appendix B
aii	The expertise of that person to compile a specialist report including a curriculum vitae	Appendix B
b	A declaration that the person is independent in a form as may be specified by the competent authority	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
cii	A description of existing impacts on the site, cumulative impacts of the proposed development and levels of acceptable change	Section 5
d	The date and season of the site investigation and the relevance of the season to the outcome of the assessment	N/A
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

	A specialist report prepared in terms of the Environmental Impact Regulations of 2017 must contain:	Relevant section in report
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
nii	If the opinion is that the proposed activity or portions thereof should be authorised, any avoidance, management and mitigation measures that should be included in the EMPr, and where applicable, the closure plan	Sections 6, 8
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 of any comments that were received during any consultation process	N/A
q	Any other information requested by the competent authority.	N/A
2	Where a government notice gazetted by the Minister provides for any protocol or minimum information requirement to be applied to a specialist report, the requirements as indicated in such notice will apply.	N/A



Figure 1: Google Earth map of the general area to show the relative land marks. The Kareerand BESS and grid routes are shown by the red lines.



Figure 2: Google Earth map of the Kareerand BESS (coloured blocks in the west) and the access road to the site (thin red line from the east).



Figure 3: Google Earth Map of the proposed grid connection for the Kareerand BESS site (red-black-yellow rectangles in the east) to the Hermes MTS in the west (orange line).

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 include records housed at the Evolutionary Studies Institute at the University of the Witwatersrand and SAHRA databases; eg <https://sahris.sahra.org.za/map/palaeo>
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' representativity 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 4: Geological map of the area around the Kareerand BESS site, access road and grid connection within the yellow rectangle. Abbreviations of the rock types are explained in Table 2. Map enlarged from the Geological Survey 1: 250 000 map 2626 West Rand.

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

Symbol	Group/Formation	Lithology	Approximate Age
Q	Quaternary	Alluvium, sand, calcrete	Quaternary, ca 1.0 Ma to present
Pe	Undifferentiated Eccca Group, Karoo SG	Shales, sandstones, mudstones, coal	Early Permian Ca 290-270 Ma
Vdi	Diabase	Intrusive volcanic dykes and sills	Post Transvaal SG
Vm	Magaliesberg Fm, Pretoria Group, Transvaal SG	Quartzite, minor hornfels	<2080 Ma
Vsi	Silverton Fm, Pretoria Group, Transvaal SG	Shale, carbonaceous in places, hornfels, chert	Ca 2202 Ma
Vh	Hekpoort Fm, Pretoria Group, Transvaal SG	Volcanic rocks	Ca 2224 Ma
Vbo	Boshoek Fm, Pretoria Group, Transvaal SG	Quartzite	Ca 2266 Ma
Vt	Timeball Hill Fm, Pretoria Group, Transvaal SG	Shale, siltstone, conglomerate in places; dotted = Quartzite	Ca 2316 – 2266 Ma

The project lies in the northern part of Transvaal Basin with some formations of the of the Transvaal Supergroup exposed. There is one outlying remnant of the much younger Eccca Group rocks in the west of the project area. Considerably younger Quaternary sands and alluvium have accumulated in the valleys and depressions (Figure 4).

TRANSVAAL SG

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.

Making up the lower Pretoria Group are the **Timeball Hill Formation** and the **Boshoek Formation**. The **Hekpoort**, Dwaalheuwel, Strubenkop and Daspoort Formations form a sequence as the middle part of the Pretoria Group, Transvaal Supergroup, and represent rocks that are over 2060 million years old. The Hekpoort Formation is a massive lava deposit and is overlain by the Dwaalheuwel conglomerates, siltstone and sandstone (not present here). A hiatus separates the Strubenkop Formation slates and shales from the overlying quartzites of the Daspoort Formation. Upper Pretoria Group formations are the Silverton, Magaliesberg, Vermont, Lakenvalei, Nederhorst, Steenkampsberg and Houtenbek Formations

Chuniespoort Subgroup

In this part of the Transvaal Basin there are two lithologies in the Chuniespoort Subgroup, namely the basal Black Reef Formation and the overlying **Malmani Subgroup** that has five formations but they are not distinguishable here.

Pretoria Group

The Pretoria Group is approximately 6-7km thick and is composed mostly of mudrocks alternating with quartzitic sandstones, significant interbedded basaltic-andesitic lavas and subordinate conglomerates, diamictites and carbonate rocks. These have been subjected to low grade metamorphism (Eriksson et al., 2006). The Bushveld Complex intrusion has affected the layering of the formations.

Overlying the Rooihoogte Formation is the **Timeball Hill Formation** which is composed of thick shales and subordinate sandstones that were deposited in a fluvio-deltaic basin-filling sequence (Eriksson et al., 2006). A number of facies are included in this formation. At the base is black shale facies associated with subsurface lavas and pyroclastic rocks of the Bushy Bend Lava Member. Above these are rhythmically interbedded mudstones/siltstones and fine-grained sandstones that have been interpreted as turbidite deposits (Eriksson et al., 2006). These fine-grained sediments grade up into the medial Klapperkop Quartzite Member that has been interpreted as fluvio-deltaic sandstones which fed the more distal turbidites (ibid). Above this is an upper shale member and rhythmite facies. In the east of the Transvaal Basin the Upper Timeball Hill shales have undergone extensive soft-sediment deformation caused by the onset of tectonic instability that led to the eventual fan deposits of the Boshoek Formation and the flood basalts of the Hekpoort Formation (ibid)

The **Boshoek Formation** is made up of two lobes of immature conglomerates and sandstones and subordinate mudrocks that entered the basin from the northeast and the northwest (Eriksson et al., 2006). They were laid down on distal fans and sandy fluvial braid-plains with a shallow lake occurring in the central part of the basin (ibid).

The **Hekpoort Formation** is composed of subaerial lavas that intruded into the Boshoek sandstones. These basaltic-andesitic lavas are thickest in the south of the Transvaal basin, thinning to the west and thinnest in the northeast (Eriksson et al., 2006).

Within the **Silverton Formation** are the lower Boven Shale Member, Machadorp Volcanic Member and upper Lydenburg Shale Member. The lower shales are alumina-rich and best represented in the eastern part of the Transvaal Basin. Shallow subaqueous

eruptives formed the tholiitic basalts and then the tuffaceous shales that are high in CaO-MnO-MgO formed the Lydenburg Member (Eriksson et al., 2006). The Silverton Formation has been interpreted as a high-stand facies tract that reflected the advance of an epeiric sea onto the Kaapvaal Craton from the east, so the Daspoort Formation would represent a lowstand facies tract or a transgressive systems tract (ibid).

QUATERNARY

There were two large basins dominating southern Africa during the Cenozoic, with the Kalahari Basin to the west and the Bushveld basin to the east. Both basins are bounded along their southern extent by the more or less west-east trending Griqualand-Transvaal Axis (Partridge et al., 2006). These sediments are not easy to date but recent attempts are gradually filling in the history of the sands, sand dunes and inter-dunes (Botha, 2021).

Quaternary Kalahari sands cover large parts of the rocks in this region, especially to the west. This is the largest and most extensive palaeo-erg in the world (Partridge et al., 2006) and is composed of extensive aeolian and fluvial sands, sand dunes, calcrete, scree and colluvium. Periods of aridity have overprinted the sands, and calcrete and silcrete are common. Most geological maps indicate these sands simply descriptively (aeolian sand, gravelly sand, calcrete) or they are lumped together as the Gordonina Formation because the detailed regional lithostratigraphic work has not been done. Nonetheless, these sands have eroded from the interior and have been transported by wind or water to fill the basin. Reworking of the sands or stabilisation by vegetation has occurred. Probable ages of dune formation are around 100 kya (thousand years), 60 kya, 27-23 kya and 17-10 kya (in Botha, 2021).

ii. Palaeontological context

The palaeontological sensitivity of the area under consideration is presented in Figures 5-6. The site for the BESS and PV facility, as well as the access road that will be upgraded, are on non-fossiliferous diabase which are intrusive volcanic rocks (grey in Figure 5). This part of the proposed project will have no impact on the palaeontology.

The proposed grid connection corridor from the Kareerand BESS facility and the existing Eskom Hermes MTS is over moderately fossiliferous Hekpoort Formation, highly sensitive narrow bands of other Pretoria Group Rocks and the very highly sensitive Malmani Subgroup around Buffelsfontein and Hermes MTS (red, Figure 6).

The Transvaal Supergroup sequence of sedimentary and volcanic rocks has been interpreted as having undergone three cycles of tectonically controlled basin subsidence and infilling with clastic deposits from the west and northwest. The first cycle (Chuniespoort Group) was a shallow seaway in a marine environment where the carbonate platform (Malmani Subgroup) was deposited and has a variety of limestones and dolomite (Erikson et al., 2012). The different lithofacies represent different depths of formation of carbonates, for example, intertidal zone, high energy zone and shallow subtidal deposits are limestone and dolomite, with flat domes and columnar stromatolites being formed in the intertidal zone. In the high energy zone oolites,

oncolites and ripples were formed, while in the deep tidal zone elongated stromatolitic mounds were formed (Truswell and Eriksson, 1973; Eriksson and Altermann, 1998).

After a hiatus of about 80 Myr, the second cycle (Duitschland, Rooihoogte and Timeball Hill Formations) occurred under glacial influence. The stromatolites in the Timeball Hill Formation are questionable but they are present in the Duitschland Formation (Schröder et al., 2016).

The age of the lower **Timeball Hill Formation** is constrained at 2322–2316 Ma by Re–Os pyrite geochronology from black shales at its base (Figure 2; Bekker et al., 2004; Hannah et al., 2004). Tuff beds in the upper Timeball Hill Formation gave U–Pb ages of 2256 ± 6 to 2266 ± 4 Ma (Fig. 2; Rasmussen et al., 2013). The Timeball Hill Formation represents deltaic deposition in an intracratonic basin, with clastics sourced from the east to northeast (Coetzee et al., 2006). There are no records of fossils in the Timeball Hill Formation (Eriksson et al., 2006, 2012). The age of the sediments precedes the evolution of body fossils (Plumstead, 1969; Benton, 2005) so only micro-organisms would have evolved. Deepwater, turbidite and tuff beds are not settings that are conducive to the preservation of fossils, particularly small and fragile fossils. The SAHRIS interpretation, based on the Palaeotechnical report of North West Province (Groenewald et al., 2014), is likely to be incorrect.

The third cycle after a brief hiatus, represented by the rest of the Pretoria Group, was deposited in a shallow embayment. Carbonates (not necessarily stromatolites) are reported from the upper Silverton Formation, the Houtenbeck and Vermont Formations. From the Magaliesberg Formation there have been several reports of microbial features. No fossils are recorded from the Rayton Formation, and the upper Pretoria Group rocks are not listed in the Palaeotechnical report for Gauteng (Groenewald et al., 2014), however the rocks are quartzites and shales like the underlying members of the Pretoria Group. Since Parizot et al., (2005) first recorded microbial mat features from the Magaliesberg Formation north of Pretoria, a number of other occurrences have been reported in this formation (Bosch and Eriksson, 2008; Eriksson et al., 2012).

Bosch and Eriksson (2008) described crack-like features, vermiform structures and circular imprints resembling concretions or, possibly oncolites, that occur on sand sheet surfaces within the uppermost beds of the **Magaliesberg Formation**. They indicated two localities, one north of Pretoria, on the farm Baviaanspoort 330 JR and the other on the farm Rietvlei 518 JR, east of Pretoria. Leeuwpoort is northeast of Pretoria. The presence of such microbial mat-like features found in epeiric marine tidally dominated coastline. The rhythmic alternation of water levels inherent in such settings can explain desiccation of microbial mats growing on the sandy substrates formed within the palaeoenvironment. In addition, the shifting loci of deposition were probably also related to braided fluvial inputs, through the medium of braid deltas (Bosch and Eriksson, 2008).

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.

Microbialites (sensu Burne and Moore, 1987) are organo-sedimentary deposits formed from interaction between benthic microbial communities (BMCs) and detrital or chemical sediments. In addition, microbialites contrast with other biological sediments in that they are generally not composed of skeletal remains. Archean carbonates mostly consist of stromatolites. These platforms could have been the site of early O₂ production on our planet. Stromatolites are the laminated, organo-sedimentary, non-skeletal products of microbial communities, which may have included cyanobacteria, the first photosynthetic organisms to produce oxygen. Another type of trace fossil has been termed Microbially-induced sedimentary structures (MISS sensu Noffke et al., 2001) or simply 'fossil mats' (sensu Tice et al., 2011). These include swirls, rip-ups, crinkled surfaces and wrinkles that were formed by the mucus extruded by littoral algae or microbes and bound together sand particles. Davies et al. (2016) caution against the assumption that all such structures are microbially induced unless there is additional evidence for microbes in the palaeoenvironment.

Nonetheless, stromatolites and microbialites are accepted as trace fossils of algal colonies. MISS could be microbially or abiotically formed. The oldest stromatolites have been recorded from the Barberton Supergroup that was deposited between 3.55 to ca. 3.20 Ga, and stromatolites still form today in warm, shallow seas (Homan, 2019).

KALAHARI GROUP

Aeolian sands and alluvium are fairly mobile and very porous so they do not provide suitable conditions for preservation of organic matter (Cowan, 1995). Only in places where the sands have been waterlogged, such as palaeo-pans or palaeo-springs, is there any chance of fossilisation. For example, roots can be encased in calcium-rich or silica-rich sands and crusts, known as rhizoliths or rhizcretions, can form around the roots, invertebrates or bones around the margin of a pond, pan or spring (Klappa, 1980; Cramer and Hawkins, 2009; Peters et al., 2022).



Figure 2: SAHRIS palaeosensitivity map for the site for the proposed Kareerand BESS and PV site (yellow square) and new access road (yellow line). Background colours indicate the following degrees of sensitivity: red = very highly sensitive; orange/yellow = high; green = moderate; blue = low; grey = insignificant/zero.

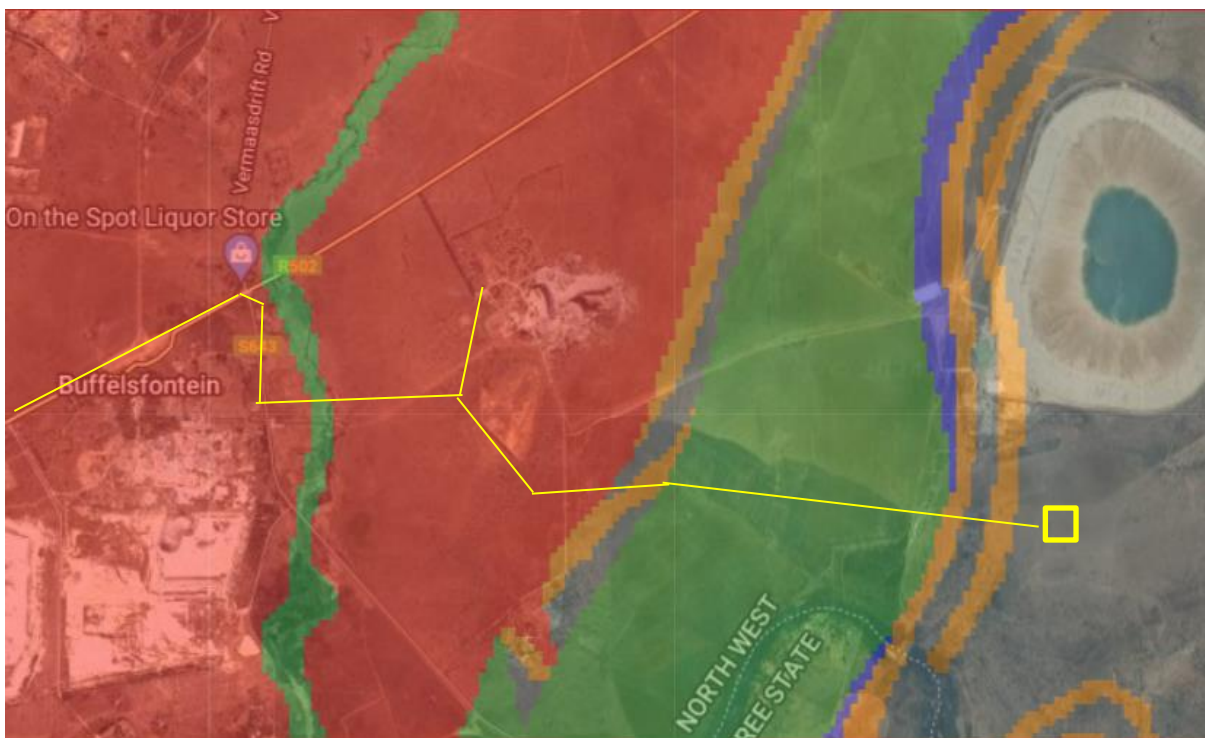


Figure 6: SAHRIS palaeosensitivity map for the Kareerand BESS gris connection to Hermes MTS shown by the yellow line. Colour coding as for figure 5 above.

4. Impact assessment

An assessment of the potential impacts to possible palaeontological resources considers the criteria encapsulated in Table 3:

Table 3a: Criteria for assessing impacts

PART A: DEFINITION AND CRITERIA		
Criteria for ranking of the SEVERITY/NATURE of environmental 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	-
	L	Soils do not preserve fossils; so far there are no records from the Malmani Subgroup of trace fossils, plant or animal fossils in this region so it is very unlikely that fossils occur on the site. The impact would be negligible
	L+	-
	M+	-

PART B: Assessment		
	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 in the dolomites of the Malmani Subgroup, the spatial scale will be localised within the site boundary.
	M	-
	H	-
PROBABILITY	H	-
	M	-
	L	It is extremely unlikely that any fossils would be found in the loose soils and sands that cover the area or in the dolomites that will be excavated for pole foundations. Nonetheless, a Fossil Chance Find Protocol should be added to the eventual EMPr.

Based on the nature of the project, surface activities may impact upon the fossil heritage if preserved in the development footprint. The geological structures suggest that the rocks are either the wrong type to contain fossils or the trace fossils are very uncommon. Furthermore, the material to be excavated is soil and this does not preserve fossils. Since there is a small chance that trace fossils may occur in the dolomites of the Malmani Subgroup and may be disturbed a Fossil Chance Find Protocol has been added to this report. Taking account of the defined criteria, the potential impact to fossil heritage resources is 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 only some contain trace fossils. Previous fieldwork in that area for other projects by this author showed that stromatolites occur north of the N14 and only cherts occur to the south (Bamford, 2022). The soils and sands of the Quaternary period would not preserve fossils.

6. Recommendation

Based on experience and the lack of any previously recorded fossils from the area, it is extremely unlikely that any fossils would be preserved in the overlying soils and sands of the Quaternary. There is a very small chance that fossils may occur below ground in dolomites of the Malmani Subgroup 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 for powerline poles have commenced then they should be rescued and

a palaeontologist called to assess and collect a representative sample. The impact on the palaeontological heritage would be low. There is no no-go area or route and there is no cumulative impact because fossil sites are unique and their distribution can be very localised. They are inert so their damage or removal has no effect whatsoever on other fossil sites.

ASPECT	SCREENING TOOL SENSITIVITY	VERIFIED SENSITIVITY	OUTCOME STATEMENT/ PLAN OF STUDY	RELEVANT SECTION MOTIVATING VERIFICATION
Palaeontology	Very High to Zero	Low to Zero	Paleontological Impact Assessment	Section 7.2. SAHRA Requirements

7. References

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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 must be given a cursory inspection by the environmental officer or designated person. Any fossiliferous material (trace fossils, stromatolites, plants, insects, bone or coal) 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 trace fossils such as stromatolites or microbially features (trails, curls, rip-ups, mudcracks) trace fossils in the dolomites, limestones, shales and mudstones (for example see Figure 7). 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. Stromatolites, 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



Weathering of dolomite



Small domal stromatolites



Side view of a stromatolite



Surface view of domal stromatolites

Figure 7: Photographs from the Malmani Subgroup of different types of stromatolites in dolomite.

10. Appendix B – Details of specialist

Curriculum vitae (short) - Marion Bamford PhD January 2024

Present employment: Professor; Director of the Evolutionary Studies Institute.
Member Management Committee of the NRF/DSI Centre of Excellence Palaeosciences, University of the Witwatersrand, Johannesburg, South Africa

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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

v) Supervision of Higher Degrees

All at Wits University

Degree	Graduated/completed	Current
Honours	13	0
Masters	13	3
PhD	13	7
Postdoctoral fellows	14	4

vi) 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.

vii) 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: 30 local and international journals

viii) **Palaeontological Impact Assessments**

27 years' experience in PIA site and desktop projects

Selected from recent projects only – list not complete:

- 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 2022 for AHSA
- Wolf-Skilpad-Grassridge OHPL 2022 for Zutari
- Iziduli and Msenge WEFs 2022 for CTS Heritage
- Hendrina North and South WEFs & SEFs 2022 for Cabanga
- Dealesville-Springhaas SEFs 2022 for GIBB Environmental
- Vhuvhili and Mukondeleli SEFs 2022 for CSIR
- Chemwes & Stilfontein SEFs 2022 for CTS Heritage
- Equestria Exts housing 2022 for Beyond Heritage
- Zeerust Salene boreholes 2022 for Prescali
- Tsakane Sewer upgrade 2022 for Tsimba
- Transnet MPP inland and coastal 2022 for ENVASS
- Ruighoek PRA 2022 for SLR Consulting (Africa)
- Namli MRA Steinkopf 2022 for Beyond Heritage
- Adara 2 SEF 2023 for CTS Heritage
- Buffalo & Lyra SEFs 2023 for Nextec
- Camel Thorn Group Prospecting Rights 2023 for AHSA
- Dalmanutha SEFs 2023 for Beyond Heritage
- Elandsfontein Residential 2023 for Beyond Heritage
- Waterkloof Samancor 2023 for Elemental Sustainability
- Zonnebloem WTP 2023 for WSP
- Elders Irrigation 2023 for SRK
- Leghoya WEFS 2023 for Red Cap & SLR

ix) **Research Output**

Publications by M K Bamford up to January 2024 peer-reviewed journals or scholarly books: over 175 articles published; 5 submitted/in press; 14 book chapters.

Scopus h-index = 32; Google Scholar h-index = 40; -i10-index = 121 based on 7261 citations.

Conferences: numerous presentations at local and international conferences.