

HERITAGE IMPACT ASSESSMENT

(REQUIRED UNDER SECTION 38(8) OF THE NHRA (No. 25 OF 1999))

FOR THE PROPOSED MINING RIGHT OVER PORTION 0 AND PORTION 1 (REMAINING
EXTENT) OF THE FARM DE KLERKS KRAAL NO 231, THEUNISSEN MUNICIPAL
DISTRICT, FREE STATE PROVINCE

Type of development:

Mining

Client:

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Developer:

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Project number 2225

Report date:

February 2022

APPROVAL PAGE

Project Name	De Klerks Kraal No 231 Mining Right
Report Title	Heritage Impact Assessment for the proposed mining right over Portion 0 and Portion 1 (Remaining Extent) of the farm De Klerks Kraal No 231, Theunissen Municipal District, Free State Province
Authority Reference Number	FS 30/5/1/2/2/10071 MR
Report Status	Final Report
Applicant Name	Vengablox (Pty) Ltd

Responsibility	Name	Qualifications and Certifications	Date
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DOCUMENT PROGRESS**Distribution List**

Date	Report Reference Number	Document Distribution	Number of Copies
26 February 2022	2225	Greenmined Environmental (Pty) Ltd	Electronic Copy

Amendments on Document

Date	Report Reference Number	Description of Amendment

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REPORT OUTLINE

Appendix 6 of the GNR 326 EIA Regulations published on 7 April 2017 provides the requirements for specialist reports undertaken as part of the environmental authorisation process. In line with this, Table 1 provides an overview of Appendix 6 together with information on how these requirements have been met.

Table 1. Specialist Report Requirements.

Requirement from Appendix 6 of GN 326 EIA Regulation 2017	Chapter
(a) Details of - (i) the specialist who prepared the report; and (ii) the expertise of that specialist to compile a specialist report including a curriculum vitae	Section a Section 12
(b) Declaration that the specialist is independent in a form as may be specified by the competent authority	<i>Declaration of Independence</i>
(c) Indication of the scope of, and the purpose for which, the report was prepared	Section 1
(cA) an indication of the quality and age of base data used for the specialist report	Section 3.4 and 7.1.
(cB) a description of existing impacts on the site, cumulative impacts of the proposed development and levels of acceptable change;	9
(d) Duration, Date and season of the site investigation and the relevance of the season to the outcome of the assessment	Section 3.4
(e) Description of the methodology adopted in preparing the report or carrying out the specialised process inclusive of equipment and modelling used	Section 3
(f) details of an assessment of the specific identified sensitivity of the site related to the proposed activity or activities and its associated structures and infrastructure, inclusive of site plan identifying site alternatives;	Section 8 and 9
(g) Identification of any areas to be avoided, including buffers	Section 8 and 9
(h) Map superimposing the activity including the associated structures and infrastructure on the environmental sensitivities of the site including areas to be avoided, including buffers	Section 8
(I) Description of any assumptions made and any uncertainties or gaps in knowledge	Section 3.7
(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 or activities;	Section 1.3
(k) Mitigation measures for inclusion in the EMPr	Section 10.1
(l) Conditions for inclusion in the environmental authorisation	Section 10. 1.
(m) Monitoring requirements for inclusion in the EMPr or environmental authorisation	Section 10. 5.
(n) Reasoned opinion - (i) as to whether the proposed activity, activities or portions thereof should be authorised; (iA) regarding the acceptability of the proposed activity or activities; and (ii) if the opinion is that the proposed 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	Section 10.3
(o) Description of any consultation process that was undertaken during the course of preparing the specialist report	Section 6
(p) A summary and copies of any comments received during any consultation process and where applicable all responses thereto; and	Refer to EIA report
(q) Any other information requested by the competent authority	N.A

Executive Summary

Greenmined Environmental (Pty) Ltd was appointed as the Environmental Assessment Practitioner (EAP) by Vengablox (Pty) Ltd to undertake the required Environmental Authorisation Process for the proposed mining right over Portion 0 and Portion 1 (Remaining Extent) of the farm De Klerks Kraal No 231, Theunissen Municipal District, Free State Province. Beyond Heritage was appointed to conduct a Heritage Impact Assessment (HIA) for the project and the study area was assessed on desktop level and by a non-intrusive pedestrian field survey. Key findings of the assessment include:

- The study area is located on both sides of the Sand River that regularly floods its banks, effectively washing away any traces of heritage features if any ever occurred in these areas;
- As a result of the constant water source the study area is characterised by dense vegetation, limiting access and visibility;
- The palaeontological sensitivity of the study area is insignificant and no other heritage resources of significance were noted during the survey.

The impact to heritage resources is low and the project can commence provided that the recommendations in this report are adhered to, based on the South African Heritage Resource Authority (SAHRA) 's approval.

Recommendations:

- Implementation of a chance find procedure for the project.

Declaration of Independence

Specialist Name	Jaco van der Walt
Declaration of Independence	<p>I declare, as a specialist appointed in terms of the National Environmental Management Act (Act No 108 of 1998) and the associated 2014 Environmental Impact Assessment (EIA) Regulations, that I:</p> <ul style="list-style-type: none"> • I act as the independent 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 favourable to the applicant; • I declare that there are no circumstances that may compromise my objectivity in performing such work; • I have expertise in conducting the specialist report relevant to this application, 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 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; • All the particulars furnished by me in this form are true and correct; and • I realise that a false declaration is an offence in terms of regulation 48 and is punishable in terms of section 24F of the Act.
Signature	
Date	24/01/2022

a) Expertise of the specialist

Jaco van der Walt has been practising as a CRM archaeologist for 15 years. He obtained an MA degree in Archaeology from the University of the Witwatersrand focussing on the Iron Age in 2012 and is a PhD candidate at the University of Johannesburg focussing on Stone Age Archaeology with specific interest in the Middle Stone Age (MSA) and Later Stone Age (LSA). Jaco is an accredited member of ASAPA (#159) and have conducted more than 500 impact assessments in Limpopo, Mpumalanga, North West, Free State, Gauteng, KZN as well as he Northern and Eastern Cape Provinces in South Africa.

Jaco has worked on various international projects in Zimbabwe, Botswana, Mozambique, Lesotho, DRC Zambia, Guinea and Tanzania. Through this, he has a sound understanding of the IFC Performance Standard requirements, with specific reference to Performance Standard 8 – Cultural Heritage.

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ABBREVIATIONS

ASAPA: Association of South African Professional Archaeologists
BGG Burial Ground and Graves
BIA: Basic Impact Assessment
CFPs: Chance Find Procedures
CMP: Conservation Management Plan
CRR: Comments and Response Report
CRM: Cultural Resource Management
DEA: Department of Environmental Affairs
EA: Environmental Authorisation
EAP: Environmental Assessment Practitioner
ECO: Environmental Control Officer
EIA: Environmental Impact Assessment*
EIA: Early Iron Age*
EIA Practitioner: Environmental Impact Assessment Practitioner
EMPr: Environmental Management Programme
ESA: Early Stone Age
ESIA: Environmental and Social Impact Assessment
GIS Geographical Information System
GPS: Global Positioning System
GRP Grave Relocation Plan
HIA: Heritage Impact Assessment
LIA: Late Iron Age
LSA: Late Stone Age
MEC: Member of the Executive Council
MIA: Middle Iron Age
MPRDA: Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002)
MSA: Middle Stone Age
NEMA National Environmental Management Act, 1998 (Act No. 107 of 1998)
NHRA National Heritage Resources Act, 1999 (Act No. 25 of 1999)
NID Notification of Intent to Develop
NoK Next-of-Kin
PRHA: Provincial Heritage Resource Agency
SADC: Southern African Development Community
SAHRA: South African Heritage Resources Agency

**Although EIA refers to both Environmental Impact Assessment and the Early Iron Age both are internationally accepted abbreviations and must be read and interpreted in the context it is used.*

GLOSSARY

Archaeological site (remains of human activity over 100 years old)

Early Stone Age (~ 2.6 million to 250 000 years ago)

Middle Stone Age (~ 250 000 to 40-25 000 years ago)

Later Stone Age (~ 40-25 000, to recently, 100 years ago)

The Iron Age (~ AD 400 to 1840)

Historic (~ AD 1840 to 1950)

Historic building (over 60 years old)

1 Introduction and Terms of Reference:

Beyond Heritage was appointed to conduct a HIA for the proposed mining right over Portion 0 and Portion 1 (Remaining Extent) of the farm De Klerks Kraal No 231, Theunissen Municipal District, Free State Province (Figure 1-1 to 1-4). The report forms part of the EIA and Environmental Management Programme Report (EMPr) for the development.

The aim of the study is to survey the proposed development footprint to identify cultural heritage sites, document, and assess their importance within local, provincial, and national context. It serves to assess the impact of the proposed project on non-renewable heritage resources, and to submit appropriate recommendations with regard to the responsible cultural resources management measures that might be required to assist the developer in managing the discovered heritage resources in a responsible manner. It is also conducted to protect, preserve, and develop such resources within the framework provided by the National Heritage Resources Act of 1999 (Act No 25 of 1999). The report outlines the approach and methodology utilized before and during the survey, which includes Phase 1, review of relevant literature; Phase 2, the physical surveying of the area on foot and by vehicle; Phase 3, reporting the outcome of the study.

During the survey, no sites of significance were recorded. General site conditions and features on sites were recorded by means of photographs, GPS locations and site descriptions. Possible impacts were identified and mitigation measures are proposed in the following report. SAHRA as a commenting authority under section 38(8) of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) require all environmental documents, compiled in support of an Environmental Authorisation application as defined by NEMA EIA Regulations section 40 (1) and (2), to be submitted to SAHRA for commenting. Upon submission to SAHRA the project will be automatically given a case number as reference. As such the EIA report and its appendices must be submitted to the case as well as the EMPr, once it's completed by the Environmental Assessment Practitioner (EAP).

1.1 Terms of Reference

Field study

Conduct a field study to: (a) locate, identify, record, photograph and describe sites of archaeological, historical or cultural interest; b) record GPS points of sites/areas identified as significant areas; c) determine the levels of significance of the various types of heritage resources affected by the proposed development.

Reporting

Report on the identification of anticipated and cumulative impacts the operational units of the proposed project activity may have on the identified heritage resources for all 3 phases of the project; i.e., construction, operation and decommissioning phases. Consider alternatives, should any significant sites be impacted adversely by the proposed project. Ensure that all studies and results comply with the relevant legislation, SAHRA minimum standards and the code of ethics and guidelines of ASAPA.

To assist the developer in managing the discovered heritage resources in a responsible manner, and to protect, preserve, and develop them within the framework provided by the National Heritage Resources Act of 1999 (Act No 25 of 1999).

1.2 Project Description

Project components and the location of the proposed mining right are outlined under Table 2 and 3.

Table 2: Project Description

Project area	238.5426 ha
Magisterial District	Lejweleputswa magisterial district
Central co-ordinate of the development	28° 8'26.62"S 26°39'42.33"E
Topographic Map Number	2825 BA

Table 3: Infrastructure and project activities

Type of development	Mining Right
Size of development	238.5426 hectares
Project Components	<p>Although the proposed project footprint extends over a large area, the Applicant proposes to divide the mining right into smaller mining areas of ± 2.5 ha each. It is proposed that no more than two (2) minor areas will be mined at any given time. In addition to the proposed 2.5 ha minor areas, the Applicant will have a designated processing- and stockpiling area (1.5 ha) where the mined material will be screened and washed prior to being stockpiled and transported to clients. In other words, the total footprint to be altered by mining activities at any given time calculates to ± 6.5 ha of the 239 ha mining right area. Once a 2.5 ha area is mined-out the area will be rehabilitated prior to the opening of a third minor area. In light of this, the current project proposal will entail the disturbance of $\pm 2.7\%$ of the mining right area (major area) at any given time.</p> <p>Should the Applicant be issued with a mining right (MR) and the project commence, the principal mining activities is expected to include the following:</p> <ul style="list-style-type: none"> • Site establishment; • Stripping and stockpiling of topsoil of the operational areas; • Excavation and/or pumping of sand; • Screening and washing of the sand; • Stockpiling of the sand until it is sold; and • Replacing the topsoil and reinstatement of the mined-out block (minor area) prior to moving to a new minor area. • Presently it is proposed that the following site infrastructure will be established within the footprint of the designated processing area: <ul style="list-style-type: none"> • Ablution facilities; • Buildings for administration, storage and workshop purposes; • Diesel depot (<23 m³); • Generators; • Internal roads; • Screening- and washing plants; • Settling pond; • Topsoil stockpiles; and • Wash bay and parking area. <p>In each minor area (2.5 ha) the infrastructure will entail:</p> <ul style="list-style-type: none"> • Generators; • Internal roads; • Sand pumps; and • Settling pond.

1.3 Alternatives

The following information was obtained from the Draft Scoping report (Fouche 2021) for the project:

Site Alternative

Site Alternative 1 (S1) entails the mining of ±239 ha from Portion 0 and Portion 1 (Remaining Extent) of the farm De Klerks Kraal No 231. Should additional viable site alternatives be identified during the EIA process, the project team will heed the suggestions and investigate the possibility of implementing it. These alternatives (if identified) will be discussed in detail in the draft EIAR to be distributed for public comments.

Layout Alternatives

The layout of the mining area within the footprint of S1, or other site alternative (if identified), will be determined during the EIA process upon receipt of the specialist's input. Sensitive areas, if identified by the specialist, will be portrayed on a map of the proposed footprint to deduce the allowable mining areas. Once the no-go (sensitive) areas (if any) were demarcated various layout alternatives will be investigated to identify the best possible option for the proposed activity.

No-go Alternative

In the event that the no-go alternative is implemented the land use of the earmarked footprint will remain that of agriculture, and livestock farming with the sand resource unmined. Amongst others, the impact of mining on current, and future land uses of the study area will be compared to the *status quo* and will be considered as part of the EIA process, and discussed in the DEIAR..

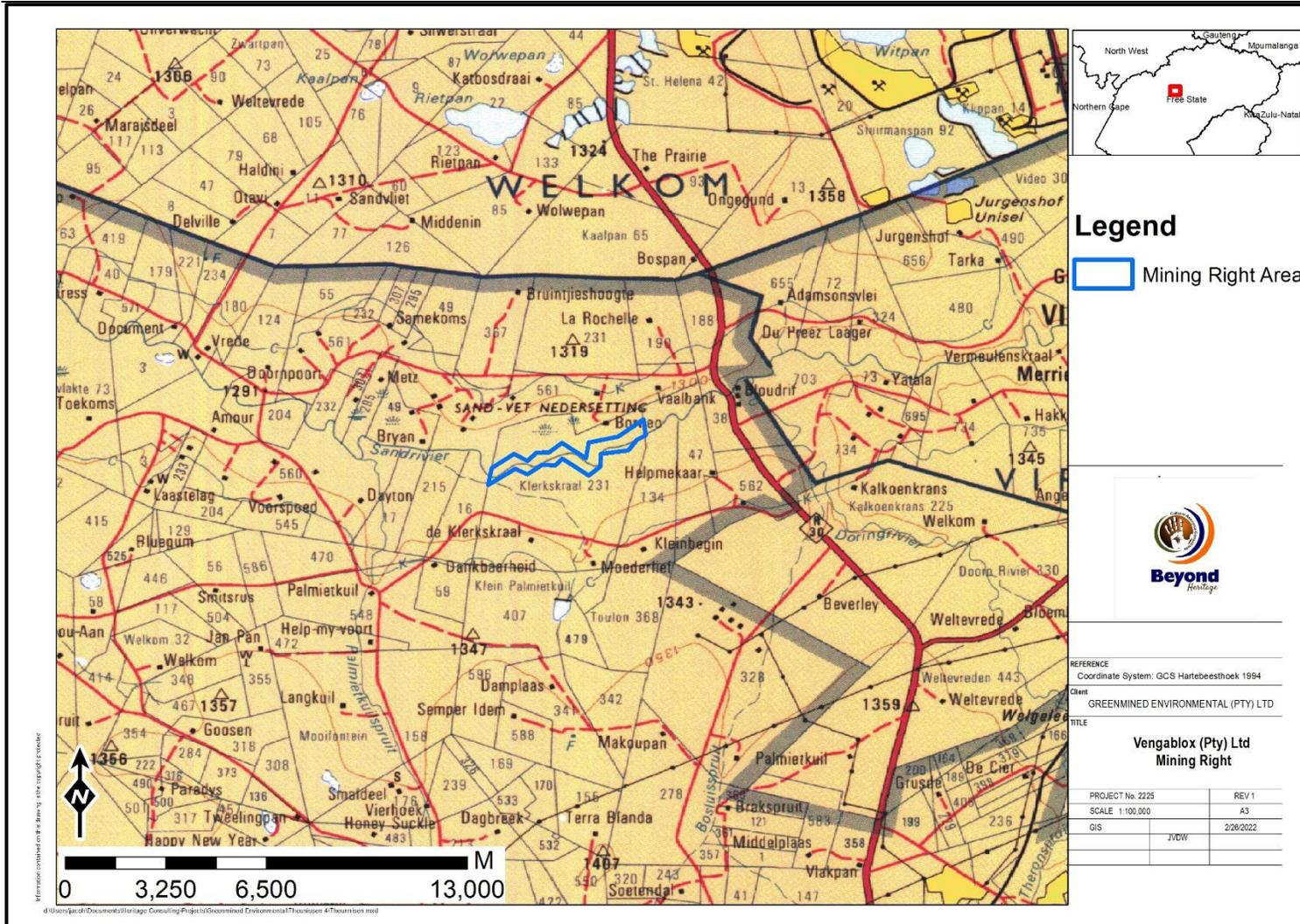


Figure 1.1. Regional setting of the project (1: 250 000 topographical map).

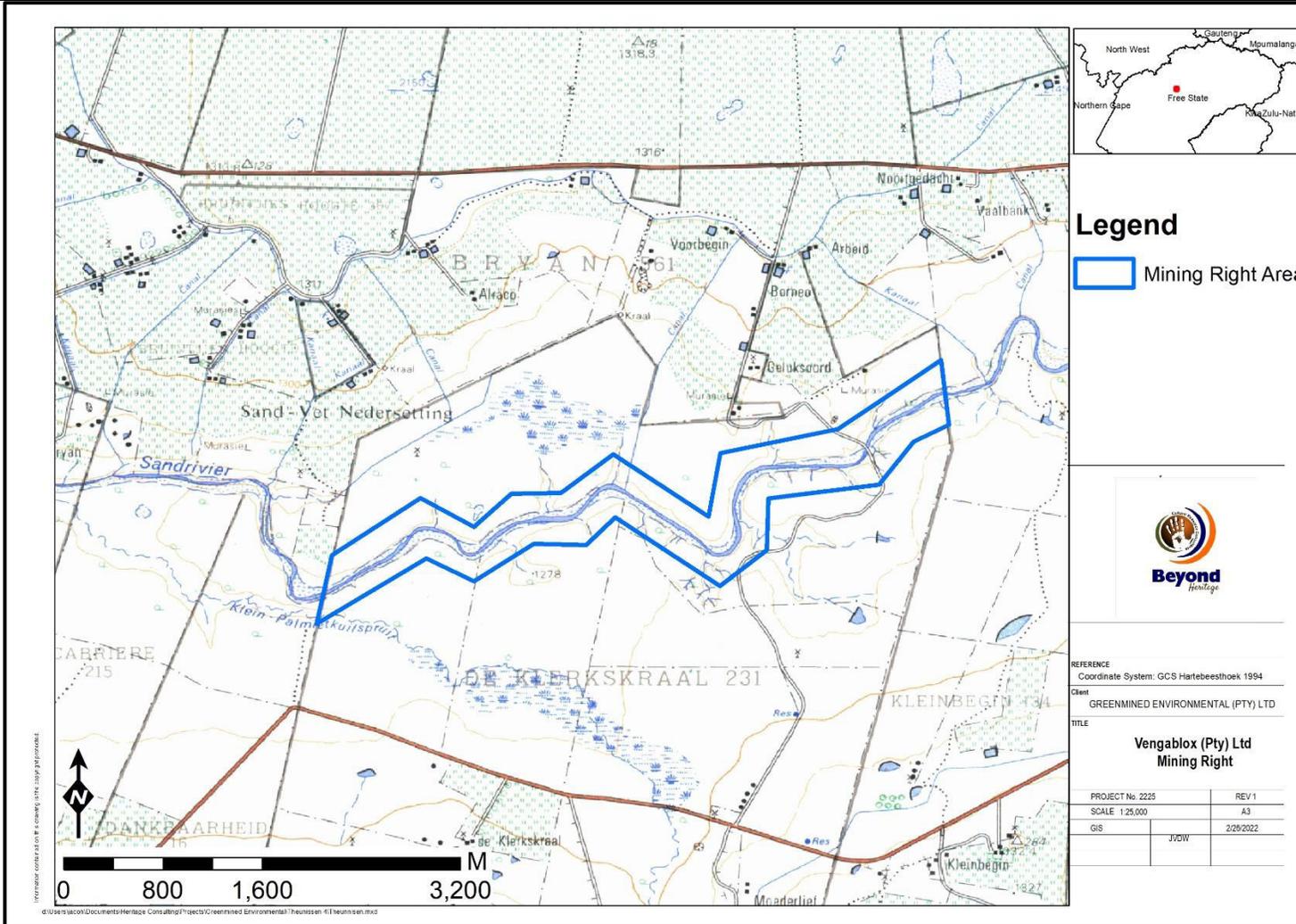


Figure 1.2. Local setting of the project (1: 50 000 topographical map).

2 Legislative Requirements

The HIA, as a specialist sub-section of the EIA, is required under the following legislation:

- National Heritage Resources Act (NHRA), Act No. 25 of 1999)
- National Environmental Management Act (NEMA), Act No. 107 of 1998 - Section 23(2)(b)
- Mineral and Petroleum Resources Development Act (MPRDA), Act No. 28 of 2002 - Section 39(3)(b)(iii)

A Phase 1 HIA is a pre-requisite for development in South Africa as prescribed by SAHRA and stipulated by legislation.

The overall purpose of heritage specialist input is to:

- Identify any heritage resources, which may be affected;
- Assess the nature and degree of significance of such resources;
- Establish heritage informants/constraints to guide the development process through establishing thresholds of impact significance;
- Assess the negative and positive impact of the development on these resources; and
- Make recommendations for the appropriate heritage management of these impacts.

The HIA should be submitted, as part of the impact assessment report or EMP, to the PHRA if established in the province or to SAHRA. SAHRA will ultimately be responsible for the evaluation of Phase 1 HIA reports upon which review comments will be issued. 'Best practice' requires Phase 1 HIA reports and additional development information, as per the impact assessment report and/or EMP, to be submitted in duplicate to SAHRA after completion of the study. SAHRA accepts Phase 1 HIA reports authored by professional archaeologists, accredited with ASAPA or with a proven ability to do archaeological work.

Minimum accreditation requirements include an Honours degree in archaeology or related discipline and 3 years post-university CRM experience (field supervisor level). Minimum standards for reports, site documentation and descriptions are set by ASAPA in collaboration with SAHRA. ASAPA is based in South Africa, representing professional archaeology in the SADC region. ASAPA is primarily involved in the overseeing of ethical practice and standards regarding the archaeological profession. Membership is based on proposal and secondment by other professional members.

Phase 1 HIA's are primarily concerned with the location and identification of heritage sites situated within a proposed development area. Identified sites should be assessed according to their significance. Relevant conservation or Phase 2 mitigation recommendations should be made. Recommendations are subject to evaluation by SAHRA.

Conservation or Phase 2 mitigation recommendations, as approved by SAHRA, are to be used as guidelines in the developer's decision-making process.

Phase 2 archaeological projects are primarily based on salvage/mitigation excavations preceding development destruction or impact on a site. Phase 2 excavations can only be conducted with a permit, issued by SAHRA to the appointed archaeologist. Permit conditions are prescribed by SAHRA and includes (as minimum requirements) reporting back strategies to SAHRA and deposition of excavated material at an accredited repository.

In the event of a site conservation option being preferred by the developer, a site management plan, prepared by a professional archaeologist and approved by SAHRA, will suffice as minimum requirement.

After mitigation of a site, a destruction permit must be applied for with SAHRA by the applicant before development may proceed.

Human remains older than 60 years are protected by the National Heritage Resources Act, with reference to Section 36. Graves older than 60 years, but younger than 100 years fall under Section 36 of Act 25 of 1999 (National Heritage Resources Act), as well as the Human Tissues Act (Act 65 of 1983) and are the jurisdiction of SAHRA. The procedure for Consultation Regarding Burial Grounds and Graves (Section 36[5]) of Act 25 of 1999 is applicable to graves older than 60 years that are situated outside a formal cemetery administrated by a local authority. Graves in this age category, located inside a formal cemetery administrated by a local authority, require the same authorisation as set out for graves younger than 60 years, in addition to SAHRA authorisation. If the grave is not situated inside a formal cemetery, but is to be relocated to one, permission from the local authority is required and all regulations, laws and by-laws, set by the cemetery authority, must be adhered to.

Human remains that are less than 60 years old are protected under Section 2(1) of the Removal of Graves and Dead Bodies Ordinance (Ordinance No. 7 of 1925), as well as the Human Tissues Act (Act 65 of 1983) and are the jurisdiction of the National Department of Health and the relevant Provincial Department of Health and must be submitted for final approval to the office of the relevant Provincial Premier. This function is usually delegated to the Provincial MEC for Local Government and Planning; or in some cases, the MEC for Housing and Welfare. Authorisation for exhumation and reinternment must also be obtained from the relevant local or regional council where the grave is situated, as well as the relevant local or regional council to where the grave is being relocated. All local and regional provisions, laws and by-laws must also be adhered to. To handle and transport human remains, the institution conducting the relocation should be authorised under Section 24 of Act 65 of 1983 (Human Tissues Act).

3 METHODOLOGY

3.1 Literature Review

A brief survey of available literature was conducted to extract data and information on the area in question to provide general heritage context into which the development would be set. This literature search included published material, unpublished commercial reports and online material, including reports sourced from the South African Heritage Resources Information System (SAHRIS).

3.2 Genealogical Society and Google Earth Monuments

Google Earth and 1:50 000 maps of the area were utilised to identify possible places where sites of heritage significance might be located; these locations were marked and visited during the fieldwork phase. The database of the Genealogical Society was consulted to collect data on any known graves in the area.

3.3 Public Consultation and Stakeholder Engagement:

Stakeholder engagement is a key component of any EA process, it involves stakeholders interested in, or affected by the proposed development. Stakeholders are provided with an opportunity to raise issues of concern (for the purposes of this report only heritage related issues will be included). The aim of the public consultation process was to capture and address any issues raised by community members and other stakeholders during key stakeholder and public meetings.

3.4 Site Investigation

The aim of the site visit was to:

- a) survey the proposed project area to locate, identify, record, photograph and describe sites of archaeological, historical or cultural interest;
- b) record GPS points of sites/areas identified as significant areas;
- c) determine the levels of significance of the various types of heritage resources recorded in the project area.

Table 4: Site Investigation Details

	Site Investigation
Date	23 February 2022
Season	Summer – The development footprint was sufficiently covered to understand the heritage character of the area (Figure 3.1).

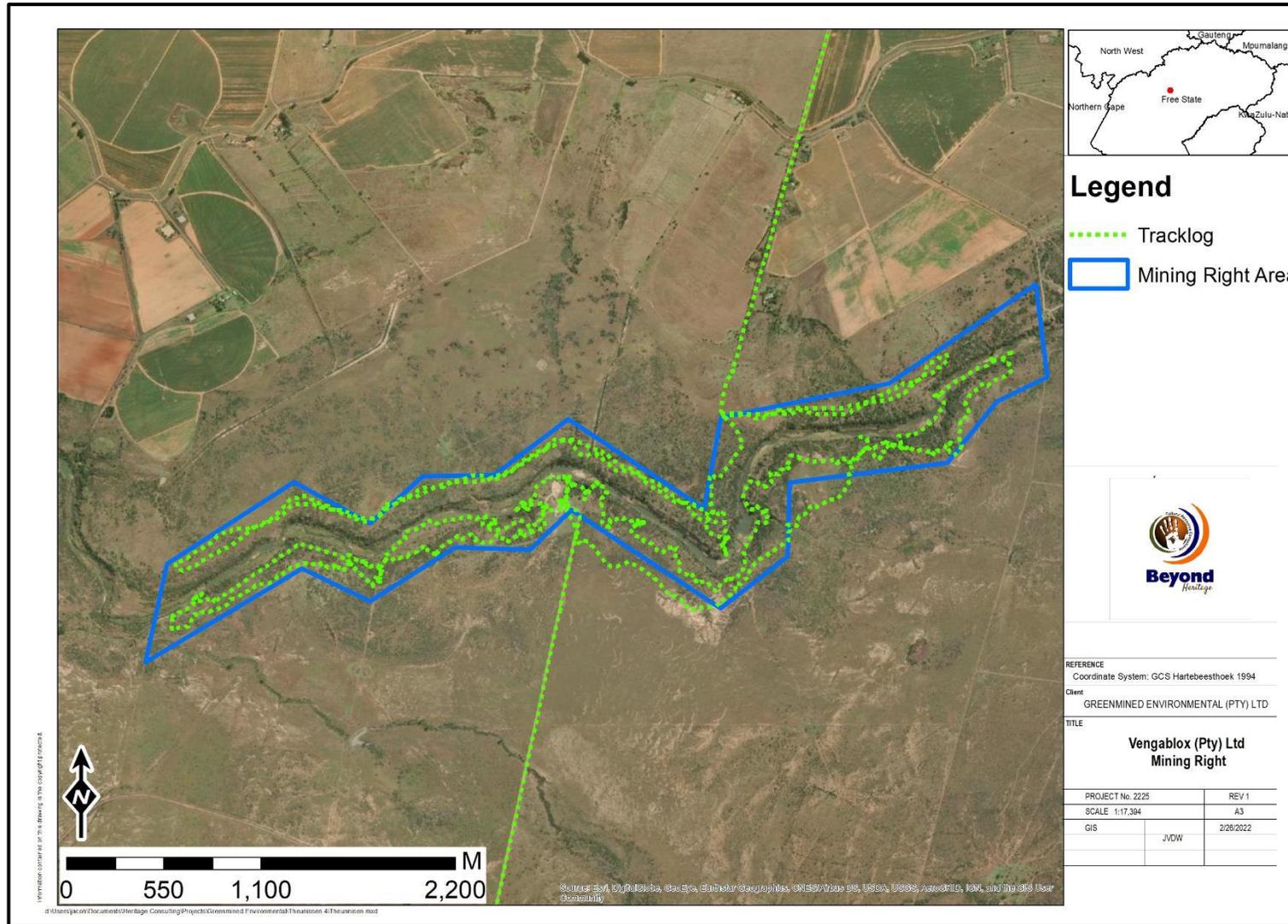


Figure 3.1. Tracklog of the survey path in green.

3.5 Site Significance and Field Rating

Section 3 of the NHRA distinguishes nine criteria for places and objects to qualify as ‘part of the national estate’ if they have cultural significance or other special value. These criteria are:

- Its importance in/to the community, or pattern of South Africa’s history;
- Its possession of uncommon, rare or endangered aspects of South Africa’s natural or cultural heritage;
- Its potential to yield information that will contribute to an understanding of South Africa’s natural or cultural heritage;
- Its importance in demonstrating the principal characteristics of a particular class of South Africa’s natural or cultural places or objects;
- Its importance in exhibiting particular aesthetic characteristics valued by a community or cultural group;
- Its importance in demonstrating a high degree of creative or technical achievement at a particular period;
- Its strong or special association with a particular community or cultural group for social, cultural or spiritual reasons;
- Its strong or special association with the life or work of a person, group or organisation of importance in the history of South Africa;
- Sites of significance relating to the history of slavery in South Africa.

The presence and distribution of heritage resources define a ‘heritage landscape’. In this landscape, every site is relevant. In addition, because heritage resources are non-renewable, heritage surveys need to investigate an entire project area, or a representative sample, depending on the nature of the project. In the case of the proposed project the local extent of its impact necessitates a representative sample and only the footprint of the areas demarcated for development were surveyed. In all initial investigations, however, the specialists are responsible only for the identification of resources visible on the surface. This section describes the evaluation criteria used for determining the significance of archaeological and heritage sites. The following criteria were used to establish site significance with cognisance of Section 3 of the NHRA:

- The unique nature of a site;
- The integrity of the archaeological/cultural heritage deposits;
- The wider historic, archaeological and geographic context of the site;
- The location of the site in relation to other similar sites or features;
- The depth of the archaeological deposit (when it can be determined/is known);
- The preservation condition of the sites; and
- Potential to answer present research questions.

In addition to this criteria field ratings prescribed by SAHRA (2006), and acknowledged by ASAPA for the SADC region, were used for the purpose of this report. The recommendations for each site should be read in conjunction with section 10 of this report.

Table 5. Heritage significance and field ratings

FIELD RATING	GRADE	SIGNIFICANCE	RECOMMENDED MITIGATION
National Significance (NS)	Grade 1	-	Conservation; national site nomination
Provincial Significance (PS)	Grade 2	-	Conservation; provincial site nomination
Local Significance (LS)	Grade 3A	High significance	Conservation; mitigation not advised
Local Significance (LS)	Grade 3B	High significance	Mitigation (part of site should be retained)
Generally Protected A (GP. A)	-	High/medium significance	Mitigation before destruction
Generally Protected B (GP. B)	-	Medium significance	Recording before destruction
Generally Protected C (GP.C)	-	Low significance	Destruction

3.6 Impact Assessment Methodology

The criteria below are used to establish the impact rating on sites:

- The **nature**, which shall include a description of what causes the effect, what will be affected and how it will be affected.
- The **extent**, wherein it will be indicated whether the impact will be local (limited to the immediate area or site of development) or regional, and a value between 1 and 5 will be assigned as appropriate (with 1 being low and 5 being high):
- The **duration**, wherein it will be indicated whether:
 - * the lifetime of the impact will be of a very short duration (0-1 years), assigned a score of 1;
 - * the lifetime of the impact will be of a short duration (2-5 years), assigned a score of 2;
 - * medium-term (5-15 years), assigned a score of 3;
 - * long term (> 15 years), assigned a score of 4; or
 - * permanent, assigned a score of 5;
- The **magnitude**, quantified on a scale from 0-10 where; 0 is small and will have no effect on the environment, 2 is minor and will not result in an impact on processes, 4 is low and will cause a slight impact on processes, 6 is moderate and will result in processes continuing but in a modified way, 8 is high (processes are altered to the extent that they temporarily cease), and 10 is very high and results in complete destruction of patterns and permanent cessation of processes.
- The **probability of occurrence**, which shall describe the likelihood of the impact actually occurring. Probability will be estimated on a scale of 1-5 where; 1 is very improbable (probably will not happen), 2 is improbable (some possibility, but low likelihood), 3 is probable (distinct possibility), 4 is highly probable (most likely) and 5 is definite (impact will occur regardless of any prevention measures).
- The **significance**, which shall be determined through a synthesis of the characteristics described above and can be assessed as low, medium or high; and
- the **status**, which will be described as either positive, negative or neutral.
- the degree to which the impact can be reversed.
- the degree to which the impact may cause irreplaceable loss of resources.
- the *degree* to which the impact can be mitigated.

The **significance** is calculated by combining the criteria in the following formula:

$$S=(E+D+M) P$$

S = Significance weighting

E = Extent

D = Duration

M = Magnitude

P = Probability

The **significance weightings** for each potential impact are as follows:

- < 30 points: Low (i.e., where this impact would not have a direct influence on the decision to develop in the area),
- 30-60 points: Medium (i.e., where the impact could influence the decision to develop in the area unless it is effectively mitigated),
- 60 points: High (i.e., where the impact must have an influence on the decision process to develop in the area).

3.7 Limitations and Constraints of the study

The authors acknowledge that the brief literature review is not exhaustive on the literature of the area. Due to the nature of heritage resources and pedestrian surveys, the possibility exists that some features or artefacts may not have been discovered/recorded and the possible occurrence of graves and other cultural material cannot be excluded. This report only deals with the footprint area of the proposed development and consisted of non-intrusive surface surveys. This study did not assess the impact on medicinal plants and intangible heritage as it is assumed that these components would have been highlighted through the public consultation process if relevant. It is possible that new information could come to light in future, which might change the results of this Impact Assessment.

4 Description of Socio-Economic Environment

According to Census 2011, the municipality has a total population of 63 334 people of which 91,6% are black African, 6,7% are white people and with the other population groups making up the remaining 1,7%.

Of those aged 20 years and older, 7,6% have completed primary school, 34,7% have some secondary education, 23,2% have completed matric and 4,5% have some form of higher education.

There are 18 633 economically active (employed or unemployed but looking for work) people, and of these 38,8% are unemployed. Of the 9 661 economically active youth (15–34 years) in the area.

5 Results of Public Consultation and Stakeholder Engagement:

5.1.1 Stakeholder Identification

The relevant stakeholders and I&AP's will be informed of the mining right application by means of an advertisement in the Vista, and on-site notices that will be placed at the property boundaries as well as in Theunissen. A notification letter inviting comments on the DSR over a 30-days commenting period (ending 14 February 2022) will also be sent to the landowners, lawful occupier, neighbouring landowners, stakeholders and any other I&AP that may be interested in the project. The stakeholders and I&AP's will also be invited to a virtual meeting (26 January 2022) where the project will be introduced. The comments received on the DSR will be incorporated into the final Scoping Report (FSR) to be submitted to the DMRE for consideration.

6 Literature / Background Study:

6.1 Literature Review (SAHRIS)

A previous study was conducted on the farm De Klerkskraal 231. In the larger area three CRM studies were conducted (Dreyer 2005 & 2006, van Vollenhoven 2012). None of these studies recorded any heritage resources apart from van Vollenhoven (2012) who recorded historical structures and a cemetery. Van der (2013) conducted a study 20 km to the east of the study area and recorded structures and a cemetery.

6.1.1 Google Earth and The Genealogical Society of South Africa (Graves and burial sites)

Google Earth and 1:50 000 maps of the area were utilised to identify possible places where archaeological and historical sites might be located. The database of the Genealogical Society of South Africa indicated no known grave sites within the study area

6.2 Archaeological Background

The archaeological record for the greater study area consists of the Stone Age, Iron Age and Historical Period.

6.2.1 The Stone Age

The Stone Age is divided in Early; Middle and Late Stone Age and refers to the earliest people of South Africa who mainly relied on stone for their tools.

Early Stone Age: The period from ± 2.5 million yrs. - $\pm 250\ 000$ yrs. ago. Acheulean stone tools are dominant. No Acheulean sites are on record near the project area, but isolated finds may be possible. However, isolated finds have little value. Therefore, the project is unlikely to disturb a significant site. The presence and significance of finds can be determined by a field investigation.

Middle Stone Age: The Middle Stone Age includes various lithic industries in SA dating from $\pm 250\ 000$ yrs. – 25 000 yrs. before present. This period is first associated with archaic Homo sapiens and later Homo sapiens sapiens. Material culture includes stone tools with prepared platforms and stone tools attached to handles. Isolated MSA artefacts can be expected but it is not anticipated that these finds will have conservation value.

Late Stone Age: The period from $\pm 25\ 000$ -yrs before present to the period of contact with either Iron Age farmers or European colonists. This period is associated with Homo sapiens sapiens. Material culture from this period includes: microlithic stone tools; ostrich eggshell beads and rock art. Sites in the open are usually poorly preserved and therefore have less value than sites in caves or rock shelters. Since there are no caves in the study area no LSA sites of significance is expected although isolated finds can be expected on the river margins.

6.2.2 Iron Age (general)

The Iron Age as a whole represents the spread of Bantu speaking people and includes both the pre-Historic and Historic periods. It can be divided into three distinct periods:

The Early Iron Age: Most of the first millennium AD.

The Middle Iron Age: 10th to 13th centuries AD

The Late Iron Age: 14th century to colonial period.

The Iron Age is characterised by the ability of these early people to manipulate and work Iron ore into implements that assisted them in creating a favourable environment to make a better living.

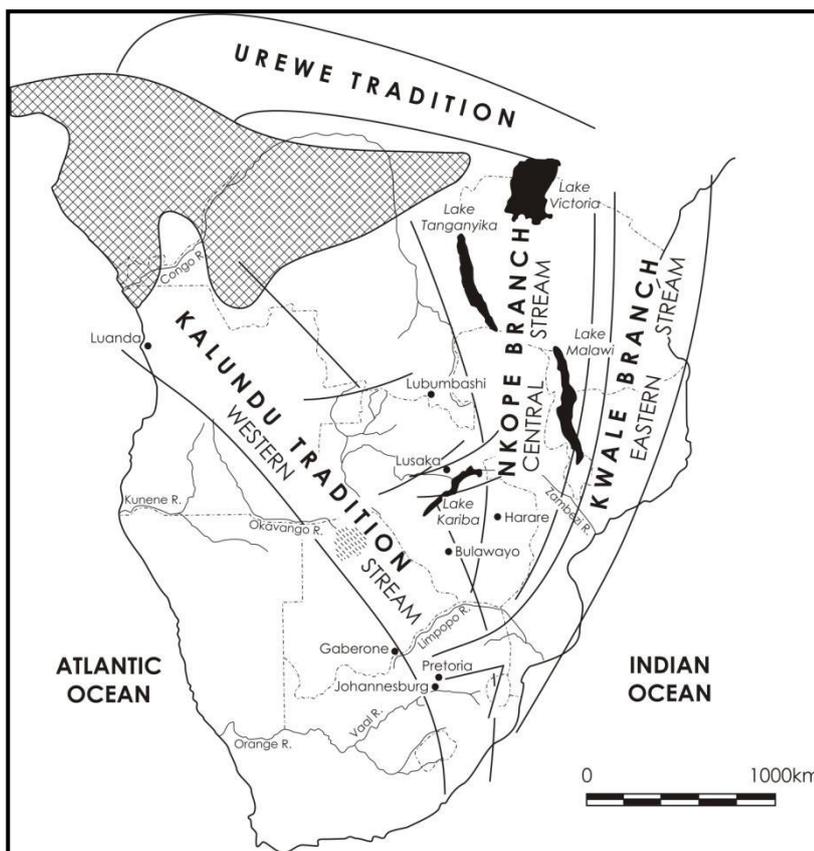


Figure 6.1: Movement of Bantu speaking farmers (Huffman 2007)

No sites dating to the Early or Middle Iron Age have been recorded or is expected for the study area. The same goes for the Later Iron Age period where the study area is situated outside the western periphery of known distribution of Late Iron Age settlements in the Free State. To the east Makgwareng ceramics belonging to the Blackburn Branch of the Urewe tradition was recorded (Dreyer 1992 and Maggs 1976). There is however a low likelihood of finding sites dating to this period in the study area.

6.2.3 Historical Background

There was some resistance to the establishment of the town Theunissen. In 1906 a group of Boer settlers, under the leadership of Commandant Helgaardt Theunissen, sent a request to the Free State government to establish a town on the farm Smaldeel and a portion of Poortjie (measuring a total of 1158 hectares). A railway station had been established on the farm Smaldeel by that time. There was however another group of settlers in the town of Winburg and the surrounding district who set up a petition against the establishment of a town in such close proximity to Winburg. 67 Persons signed the petition, arguing that the establishment of a town on Smaldeel would negatively affect trade and business in the area. The government however found that there was sufficient motivation for the town to be established, and permission for the establishment of a town was therefore granted in 1907. The new settlement was first known as Smaldeel or Winburgweg, but in 1909 became known as Theunissen. Commandant Helgaardt Theunissen was regarded to be the “father” of the town. (Niehaber et al. 1982: 68)

Buildings of historical value in the town is the house of Sir Pierre van Ryneveld and a small fort, both located close to the original train station, on the eastern border of the town. The fort was constructed by the British forces during the Anglo-Boer War, when Lord Roberts occupied Van Ryneveld’s house and used it as his military headquarters. The fort was built to protect the house. (Niehaber et al. 1982: 68-69)

7 Description of the Physical Environment

The proposed mining area extends across Highveld Alluvial Vegetation (AZa5) that forms part of the Grassland Biome. The earmarked area includes the riverbed of the Sand River, as well as an area extending ± 200 m to the north and south of the riverbed. The majority of the proposed project area falls within the banks of the river. This area is extremely overgrown making large portions inaccessible. A recent flood caused a high rise in water levels that in turn caused an overgrowth of the general vegetation of the area. Existing sand mining occur next to the area assessed.

Access to the project area was gained via the R30 running south from Welkom towards Theunissen. The surrounding areas are primarily used for game and cattle farming as well as mining activities along the banks of the river. The entire project area is characterised by lush overgrown vegetation on the banks of the river consisting of shrubs and large trees that limits heritage visibility. The study area is covered in an extremely thick layer of sand along the entire proposed area. Current mining activities include the excavation and collection of sand from the upper banks of the river as well as a plant and crusher for sifting and loading of the sand onto trucks. General site conditions are illustrated in Figure 7.1 to 7.2.



Figure 7.1. General site conditions.



Figure 7.2. General site conditions.



Figure 7.3. General site conditions at existing mine.



Figure 7.4. Thick sand cover in the study area.

8 Findings of the Survey

8.1 Heritage Resources

The study area is fallow, marked by a thick cover of sand that is the target for mining activities. The river regularly floods its banks, effectively washing away any traces of heritage features if any ever occurred in these areas and is considered to be of low heritage significance. This was confirmed during the site visit and no structures, graves or heritage finds of significance were recorded during the survey.

8.2 Cultural Landscape

The study area is rural in character with no developments indicated in the 1940's and 1980's (Figure 8.6 & 8.7).



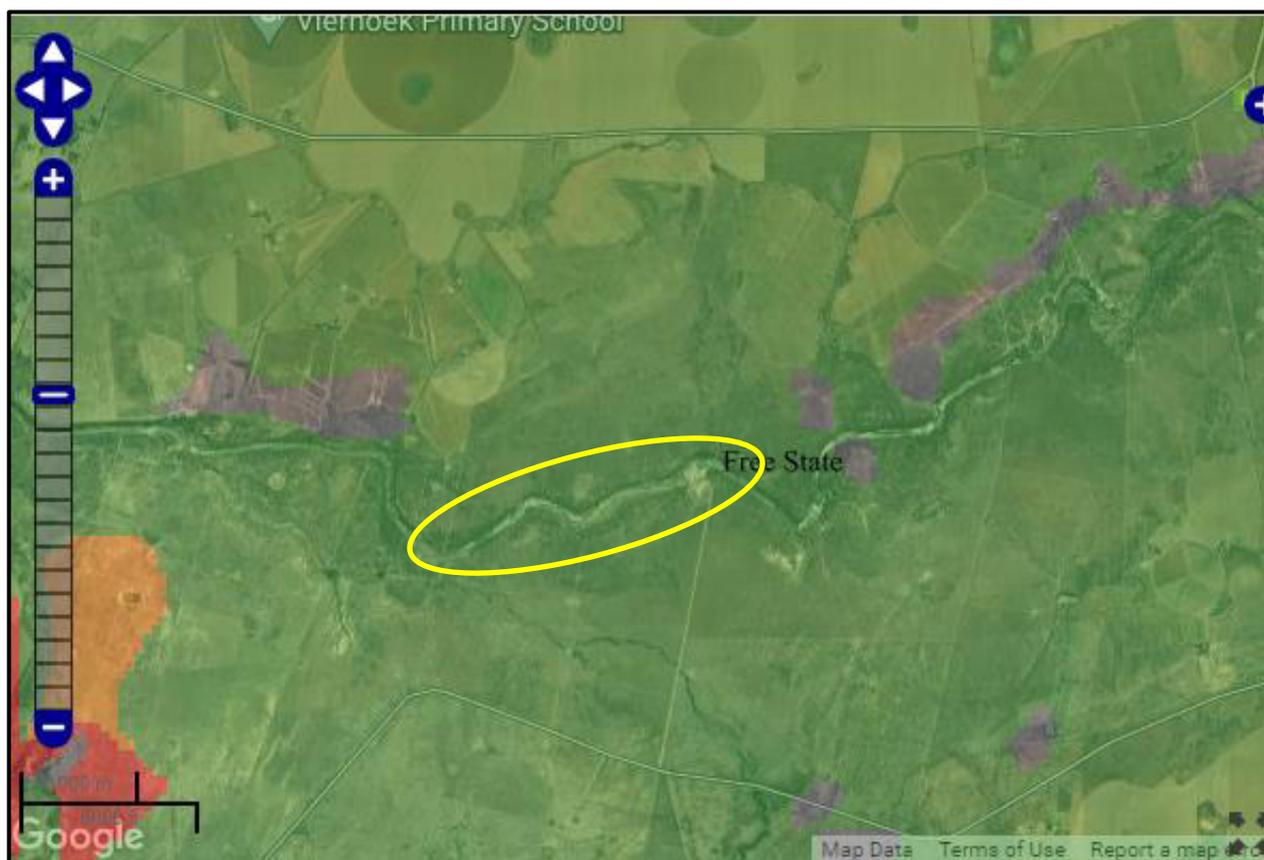
Figure 8.1. 1944 Aerial image of the study area showing no development in the study area.



Figure 8.2. 1984 Aerial image of the study area.

8.3 Paleontological Heritage

According to the SAHRA Paleontological map the study area is of moderate paleontological significance (Figure 8.1) and an independent study was conducted for this aspect. Bamford (2022) concluded that the proposed site lies on the Quaternary alluvium and sands alongside the Sand River. There is a chance that transported and fragmented robust fossils may have been washed down the river and incorporated into the sands. Such fossils, if present, would be of minimal scientific value because they would be out of primary context and their source unknown. Nonetheless, a Fossil Chance Find Protocol should be added to the EMPr.



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

Table 6. Paleontological sensitivity of the approximate study area (yellow polygon) as indicated on the SAHRA Palaeontological sensitivity map.

9 Potential Impact

No heritage sites of significance occur within the impact area and no adverse impact to heritage resources is expected. Any additional effects to subsurface heritage resources can be successfully mitigated by implementing a chance find procedure. Mitigation measures as recommended in this report should be implemented during all phases of the project. Impacts of the project on heritage resources is expected to be low during all phases of the development (Table 7).

9.1.1 Pre-Construction phase

It is assumed that the pre-construction phase involves the removal of topsoil and vegetation as well as the establishment of infrastructure. These activities can have a negative and irreversible impact on heritage features if any occur. Impacts include destruction or partial destruction of non-renewable heritage resources.

9.1.2 Construction Phase

During this phase, the impacts and effects are similar in nature but more extensive than the pre-construction phase. Potential impacts include destruction or partial destruction of non-renewable heritage resources.

9.1.3 Operation Phase

No impacts are expected during the operation phase.

9.1.4 Impact Assessment for the Project

Table 7. Impact assessment of the proposed project.

Nature: During the construction phase activities resulting in disturbance of surfaces and/or sub-surfaces may destroy, damage, alter, or remove from its original position archaeological and paleontological material or objects.		
	Without mitigation	With mitigation (Preservation/excavation of site)
Extent	Local (2)	Local (2)
Duration	Permanent (5)	Permanent (5)
Magnitude	Minor (2)	Minor (2)
Probability	Improbable (2)	Improbable (2)
Significance	18 (Low)	18 (Low)
Status (positive or negative)	Negative	Negative
Reversibility	Not reversible	Not reversible
Irreplaceable loss of resources?	Yes	Yes
Can impacts be mitigated?	NA	NA
Mitigation:		
<ul style="list-style-type: none"> Implementation of a chance find procedure for the project; 		
Cumulative impacts:		
The proposed project will have a low cumulative impact as no known heritage resources will be adversely affected.		
Residual Impacts:		
Although surface sites can be avoided or mitigated, there is a chance that completely buried sites would still be impacted on, but this cannot be quantified.		

10 Conclusion and recommendations

The study area is fallow, marked by a thick cover of sand that is the target for mining activities. The river regularly floods its banks, effectively washing away any traces of heritage features if any ever occurred in these areas. Examination of historical aerial imagery showed no structures or stone walled settlements in the study area and the impact footprint is considered to be of low heritage potential. This was confirmed during the site visit and no heritage finds of significance were recorded during the survey.

According to the SAHRA Paleontological sensitivity map the study area is of moderate paleontological significance and an independent study was conducted for this aspect (Bamford 2022). The assessment concluded that it is extremely unlikely that any fossils would be preserved in the transported sands of the Quaternary and that the impact on the palaeontological heritage would be low.

No adverse impact on heritage resources is expected by the project and it is recommended that the project can commence on the condition that the following recommendations (Section 10) are implemented as part of the EMP and based on approval from SAHRA.

10.1 Recommendations for condition of authorisation

The following recommendations for Environmental Authorisation apply and the project may only proceed based on approval from SAHRA:

Recommendations:

- Implementation of a chance find procedure for the project (as outlined in Section 10.2).

10.2 Chance Find Procedures

10.2.1 Heritage Resources

The possibility of the occurrence of subsurface finds cannot be excluded. Therefore, if during construction any possible finds such as stone tool scatters, artefacts or bone and fossil remains are made, the operations must be stopped, and a qualified archaeologist must be contacted for an assessment of the find and therefore chance find procedures should be put in place as part of the EMP. A short summary of chance find procedures is discussed below and monitoring guidelines for this procedure are provided in Section 10.5.

This procedure applies to the developer's permanent employees, its subsidiaries, contractors and subcontractors, and service providers. The aim of this procedure is to establish monitoring and reporting procedures to ensure compliance with this policy and its associated procedures. Construction crews must be properly inducted to ensure they are fully aware of the procedures regarding chance finds as discussed below.

- If during the pre-construction phase, construction, operations or closure phases of this project, any person employed by the developer, one of its subsidiaries, contractors and subcontractors, or service provider, finds any artefact of cultural significance or heritage site, this person must cease work at the site of the find and report this find to their immediate supervisor, and through their supervisor to the senior on-site manager.
- It is the responsibility of the senior on-site Manager to make an initial assessment of the extent of the find and confirm the extent of the work stoppage in that area.
- The senior on-site Manager will inform the ECO of the chance find and its immediate impact on operations. The ECO will then contact a professional archaeologist for an assessment of the finds who will notify the SAHRA.

10.2.2 Chance find protocol for Paleontology – to commence once the excavations / mining activities begin.

1. The following procedure is only required if fossils are seen on the surface and when mining commences.
2. When excavations begin the sand must be given a cursory inspection by the environmental officer or designated person. Any fossiliferous material (plants, insects, bone, 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 fossil plants, vertebrates, invertebrates or trace fossils in the shales and mudstones (for example see Figure 6). This information will be built into the EMP's training and awareness plan and procedures.
4. Photographs of the putative fossils can be sent to the palaeontologist for a preliminary assessment.
5. If there is any possible fossil material found by the environmental officer/miners then the qualified palaeontologist sub-contracted for this project, should visit the site to inspect the selected material and check the dumps where feasible.
6. Fossil plants or vertebrates that are considered to be of good quality or scientific interest by the palaeontologist must be removed, catalogued and housed in a suitable institution where they can be made available for further study. Before the fossils are removed from the site a SAHRA permit must be obtained. Annual reports must be submitted to SAHRA as required by the relevant permits.
7. If no good fossil material is recovered then 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.

10.3 Reasoned Opinion

The overall impact of the project is considered to be low and residual impacts can be managed to an acceptable level through implementation of the recommendations made in this report. The socio-economic benefits also outweigh the possible impacts of the development if the correct mitigation measures are implemented for the project.

10.4 Potential risk

Potential risks to the proposed project are the occurrence of intangible features and unrecorded cultural resources (of which graves are the highest risk). This can cause delays during construction, as well as additional costs involved in mitigation, as well as additional layout changes.

10.5 Monitoring Requirements

Day to day monitoring can be conducted by the Environmental Control Officers (ECO). The ECO or other responsible persons should be trained along the following lines:

- *Induction training:* Responsible staff identified by the developer should attend a short course on heritage management and identification of heritage resources.
- *Site monitoring and watching brief:* As most heritage resources occur below surface, all earth-moving activities need to be routinely monitored in case of accidental discoveries. The greatest potential impacts are from pre-construction and construction activities. The ECO should monitor all such activities daily. If any heritage resources are found, the chance finds procedure must be followed as outlined above.

Table 8. Monitoring requirements for the project

Heritage Monitoring					
Aspect	Area	Responsible for monitoring and measuring	Frequency	Proactive or reactive measurement	Method
Entire site	Entire project area	ECO	Weekly (Pre construction and construction phase)	Proactively	<ul style="list-style-type: none"> • If risks are manifested (accidental discovery of heritage resources) the chance find procedure should be implemented: <ol style="list-style-type: none"> 1. Cease all works immediately; 2. Report incident to the Sustainability Manager; 3. Contact an archaeologist/ palaeontologist to inspect the site; 4. Report incident to the competent authority; and 5. Employ reasonable mitigation measures in accordance with the requirements of the relevant authorities.

Heritage Monitoring					
Aspect	Area	Responsible for monitoring and measuring	Frequency	Proactive or reactive measurement	Method
					<ul style="list-style-type: none"> • Only recommence operations once impacts have been mitigated.

10.6 Management Measures for inclusion in the EMPr

Table 9. Heritage Management Plan for EMPr implementation

Area	Mitigation measures	Phase	Timeframe	Responsible party for implementation	Target	Performance indicators (Monitoring tool)
General project area	Implement chance find procedures in case possible heritage finds are uncovered	Mining	Throughout the project	Applicant EAP	Ensure compliance with relevant legislation and recommendations from SAHRA under Section 35, 36 and 38 of NHRA	ECO Checklist/Report

10.7 Knowledge Gaps

Due to the dense vegetation in study area and the often ephemeral nature of heritage resources, the possibility of discovery of heritage resources during the construction phase cannot be excluded. This limitation is successfully mitigated with the implementation of a chance find procedure and monitoring of the study area by the ECO.

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**Palaeontological Impact Assessment for the
proposed Sand Mining Right Application on Farm
De Klerkskraal 231 JD, Theunissen,
Free State Province**

Desktop Study (Phase 1)

For

Beyond Heritage

19 February 2022

Prof Marion Bamford

Palaeobotanist

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Expertise of Specialist

The Palaeontologist Consultant: Prof Marion Bamford
Qualifications: PhD (Wits Univ, 1990); FRSSAf, mASSAf
Experience: 33 years research and lecturing in Palaeontology
25 years PIA studies and over 300 projects completed

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 'MKBamford', with a horizontal line underneath it.

Signature:

Executive Summary

A Palaeontological Impact Assessment was requested for the Mining Right Application by Vengablox (Pty) Ltd to mine sand in small portions on Portions 0 and 1 of Farm De Klerks Kraal 231 JD, Theunissen, within the Lejweleputswa magisterial district of the Free State 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 desktop Palaeontological Impact Assessment (PIA) was completed for the proposed development.

The proposed site lies on the Quaternary alluvium and sands alongside the Sand River. There is a chance that transported and fragmented robust fossils may have been washed down the river and incorporated into the sands. Such fossils, if present, would be of minimal scientific value because they would be out of primary context and their source unknown. 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/ other designated responsible person once mining activities have commenced. As far as the palaeontology is concerned, the project should be authorised because the impact on the fossil heritage would be very low.

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1. Background

The Applicant, Vengablox (Pty) Ltd, applied for environmental and mining authorisation to mine sand from 238.5426 ha that extends over Portion 0 and Portion 1 (Remaining Extent) of the farm De Klerks Kraal No 231 RD within the Lejweleputswa magisterial district of the Free State Province. (Document: FS 30/5/1/2/2/10071 MR) (Figures 1-3).

The Applicant proposes to divide the mining right footprint into smaller mining areas of ±2.5 ha each (minor areas). It is proposed that no more than two minor areas will be mined at any given time. In addition to the proposed 2.5 ha minor areas, the Applicant will have a designated processing- and stockpiling area (1.5 ha) where the mined material will be screened and washed prior to being stockpiled and transported to clients. In other words, the total footprint to be altered by mining activities at any given time calculates to ±6.5 ha of the 239 ha mining right area. Once a 2.5 ha area is mined-out the area will be rehabilitated prior to the opening of a third minor area. In light of this, the current project proposal will entail the disturbance of ±2.7% of the mining right area (major area) at any given time.

A Palaeontological Impact Assessment was requested for the De Klerkskraal sand Mining Right Application (MRA). 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

	A specialist report prepared in terms of the Environmental Impact Regulations of 2017 must contain:	Relevant section in report
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
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 De Klerks Kraal mining right area is shown by the black outline.

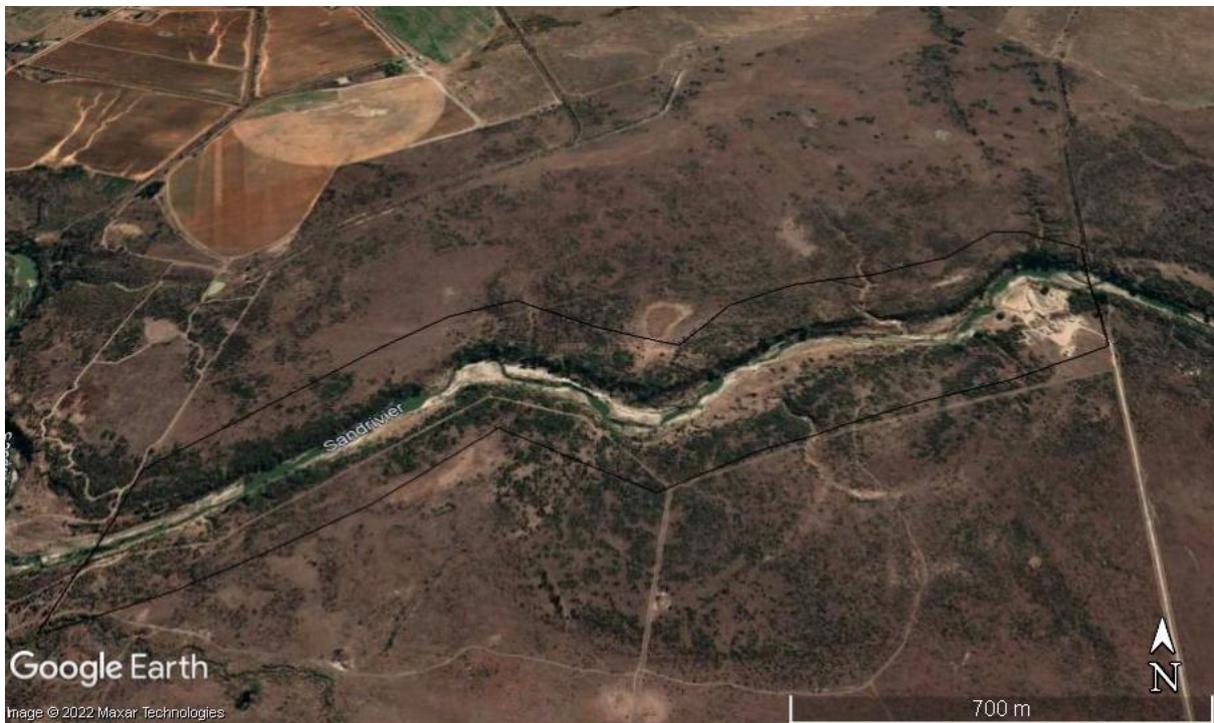


Figure 2: Google Earth Map of the proposed De Klerks Kraal Sand Mining Right area in the thin black outline

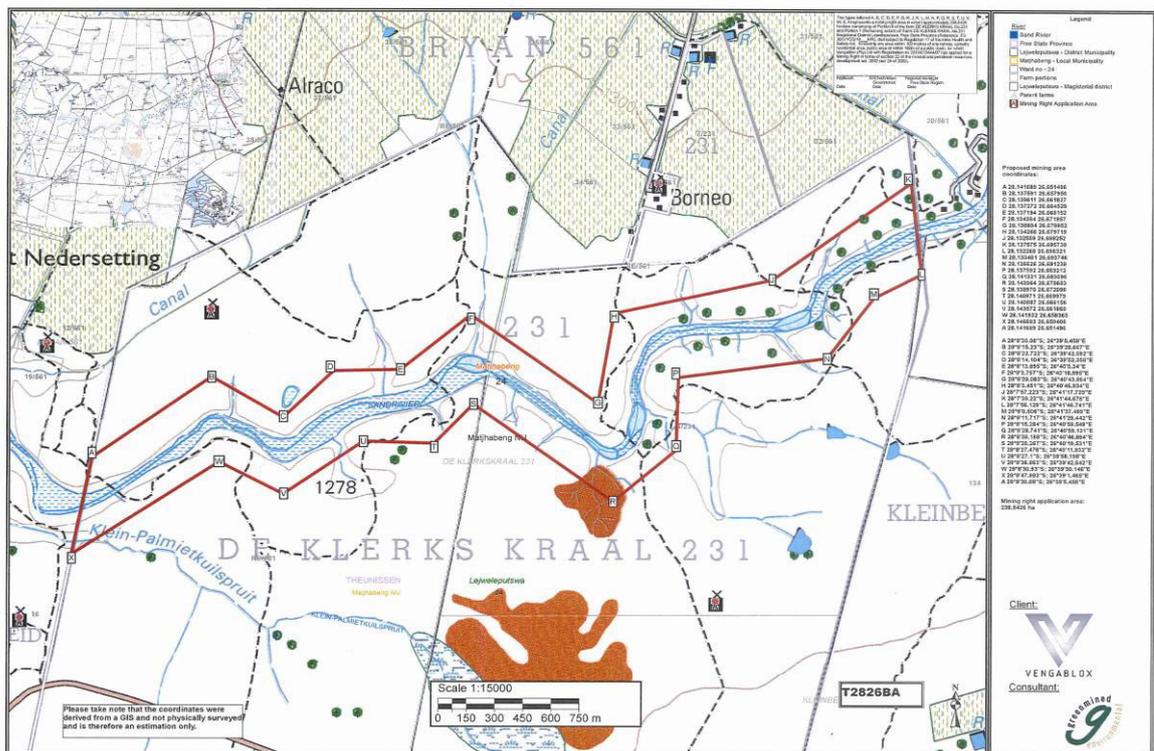


Figure 3: Annotated topographic map to show the mining right area on both sides of the Sand River with the sections shown by the red outline. Farm De Klerks Kraal 2231 JD, portions 0 and 1.

2. Methods and Terms of Reference

The Terms of Reference (ToR) for this study were to undertake a PIA and provide feasible management measures to comply with the requirements of SAHRA.

The methods employed to address the ToR included:

1. Consultation of geological maps, literature, palaeontological databases, published and unpublished records to determine the likelihood of fossils occurring in the affected areas. Sources included records housed at the Evolutionary Studies Institute at the University of the Witwatersrand and SAHRA databases;
2. Where necessary, site visits by a qualified palaeontologist to locate any fossils and assess their importance (*not applicable to this assessment*);
3. Where appropriate, collection of unique or rare fossils with the necessary permits for storage and curation at an appropriate facility (*not applicable to this assessment*); and
4. Determination of fossils' representivity or scientific importance to decide if the fossils can be destroyed or a representative sample collected (*not applicable to this assessment*).

Symbol	Group/Formation	Lithology	Approximate Age
		subordinate conglomerate	

The project lies in the central part of the Karoo Basin that contains rocks and sediments of the Karoo Supergroup, with much younger Quaternary sediments associated with fluvial systems.

The Karoo Supergroup rocks cover a very large proportion of South Africa and extend from the northeast (east of Pretoria) to the southwest and across to almost the KwaZulu Natal south coast. It is bounded along the southern margin by the Cape Fold Belt and along the northern margin by the much older Transvaal Supergroup rocks. Representing some 120 million years (300 – 183Ma), the Karoo Supergroup rocks have preserved a diversity of fossil plants, insects, vertebrates and invertebrates.

During the Carboniferous Period South Africa was part of the huge continental landmass known as Gondwanaland and it was positioned over the South Pole. As a result, there were several ice sheets that formed and melted, and covered most of South Africa. Gradual melting of the ice as the continental mass moved northwards and the earth warmed, formed fine-grained sediments in the large inland sea. These are the oldest rocks in the system and are exposed around the outer part of the ancient Karoo Basin, and are known as the Dwyka Group (Johnson et al., 2006).

Overlying the Dwyka Group rocks are rocks of the Ecca Group that are Early Permian in age. Overlying the Ecca Group are the rocks of the Beaufort Group that has been divided into the lower Adelaide Subgroup for the Upper Permian strata, and the Tarkastad Subgroup for the Early to Middle Triassic strata. As with the older Karoo sediments, the formations vary across the Karoo Basin. Large exposures of Jurassic dolerite dykes occur throughout the area. These intruded through the Karoo sediments around 183 million years ago at about the same time as the Drakensberg basaltic eruption.

Much more recent weathering and fluvial activity during the Later Quaternary has resulted in the deposition of sands along watercourses and in over bank deposits. The source for the alluvium is the whole of the river catchment. It is a dynamic system with sands and alluvium washed downstream with every flood

ii. Palaeontological context

The palaeontological sensitivity of the area under consideration is presented in Figure 5. The site for mining is in the moderately sensitive Quaternary alluvium. It is possible that fragments of the more robust fossils from upstream, such as bone or silicified wood, could have been washed down the river with the sands and temporarily deposited, until the next flood. Because of the dynamic nature of the system, the source of any gravel, sand or fossils fragments is unknown. This greatly reduces the scientific value of the fossils because they are out of primary context. In addition, any fossils would be broken and fragmented.



Figure 5: SAHRIS palaeosensitivity map for the site for the proposed Mining Right on Farm De Klerks Kraal 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.

From the SAHRIS map above the area is indicated as moderately sensitive (green) for the Quaternary alluvium and sand.

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	River sands do not preserve fossils; so far there are no records from the Quaternary of 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+	-
	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 transported and fragmented robust fossil in the Quaternary sands, the spatial scale will be localised within the site boundary.
	M	-
	H	-

PART B: Assessment		
PROBABILITY	H	-
	M	-
	L	It is extremely unlikely that any intact or recognisable fossils would be found in the loose soils and sands that cover the area and that will be mined. 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 sands are much too young to contain fossil. Furthermore, the material to be mined is sand and this does not preserve fossils. Since there is an extremely small chance that fossils may have been transported from the catchment area, and are large enough to identify 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 dolerites, sandstones, shales and sands are typical for the country and do not contain fossil plant, insect, invertebrate and vertebrate material. The sands of the Quaternary period would not preserve fossils. It is unknown if any fossils might have been transported by the river together with the sands.

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 transported sands of the Quaternary. There is a very small chance that fossil fragments may have been transported and could be recovered by the contractor, miners, environmental officer, or other responsible person once mining has 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 so the project should be authorised.

7. References

Johnson, M.R., van Vuuren, C.J., Visser, J.N.J., Cole, D.I., Wickens, H.deV., Christie, A.D.M., Roberts, D.L., Brandl, G., 2006. Sedimentary rocks of the Karoo Supergroup. In: Johnson, M.R., Anhaeusser, C.R. and Thomas, R.J., (Eds). The Geology of South Africa. Geological Society of South Africa, Johannesburg / Council for Geoscience, Pretoria. Pp 461 – 499.

Partridge, T.C., Botha, G.A., Haddon, I.G., 2006. Cenozoic deposits of the interior. 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 585-604.

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 / mining activities begin.

1. The following procedure is only required if fossils are seen on the surface and when mining commences.
2. When excavations begin the sand must be given a cursory inspection by the environmental officer or designated person. Any fossiliferous material (plants, insects, bone, 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 fossil plants, vertebrates, invertebrates or trace fossils in the shales and mudstones (for example see Figure 6). This information will be built into the EMP's training and awareness plan and procedures.
4. Photographs of the putative fossils can be sent to the palaeontologist for a preliminary assessment.
5. If there is any possible fossil material found by the environmental officer/miners then the qualified palaeontologist sub-contracted for this project, should visit the site to inspect the selected material and check the dumps where feasible.
6. Fossil plants or vertebrates that are considered to be of good quality or scientific interest by the palaeontologist must be removed, catalogued and housed in a suitable institution where they can be made available for further study. Before the fossils are removed from the site a SAHRA permit must be obtained. Annual reports must be submitted to SAHRA as required by the relevant permits.
7. If no good fossil material is recovered then 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 Quaternary fluvial deposits



Figure 6: Field photographs of transported fossils from several Quaternary deposits.

10. Appendix B – Details of specialist

**Curriculum vitae (short) - Marion Bamford PhD
January 2022**

I) Personal details

Surname : **Bamford**
First names : **Marion Kathleen**
Present employment: Professor; Director of the Evolutionary Studies Institute.
Member Management Committee of the NRF/DST Centre of Excellence Palaeosciences, University of the Witwatersrand, Johannesburg, South Africa
Telephone : +27 11 717 6690
Fax : +27 11 717 6694
Cell : 082 555 6937
E-mail : marion.bamford@wits.ac.za ;
marionbamford12@gmail.com

ii) Academic qualifications

Tertiary Education: All at the University of the Witwatersrand:

1980-1982: BSc, majors in Botany and Microbiology. Graduated April 1983.

1983: BSc Honours, Botany and Palaeobotany. Graduated April 1984.

1984-1986: MSc in Palaeobotany. Graduated with Distinction, November 1986.

1986-1989: PhD in Palaeobotany. Graduated in June 1990.

NRF Rating: C-2 (1999-2004); B-3 (2005-2015); B-2 (2016-2020); B-1 (2021-2026)

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	13	0
Masters	11	3
PhD	11	6
Postdoctoral fellows	15	1

viii) Undergraduate teaching

Geology II - Palaeobotany GEOL2008 - average 65 students per year

Biology III - Palaeobotany APES3029 - average 45 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 Open Science UK: 2021 -
Review of manuscripts for ISI-listed journals: 30 local and international journals
Reviewing of funding applications for NRF, PAST, NWO, SIDA, National Geographic,
Leakey Foundation

x) Palaeontological Impact Assessments

Selected from the past five years 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

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 = 35; -i10-index = 92

Conferences: numerous presentations at local and international conferences.