

**Palaeontological Impact Assessment for the proposed
Wembezi shopping centre, Farm Klipplaat Drift 1009,
Estcourt, KwaZulu Natal Province**

Desktop Study (Phase 1)

For

Mary Chettle & Associates

22 August 2021

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Expertise of Specialist

The Palaeontologist Consultant: Prof Marion Bamford
Qualifications: PhD (Wits Univ, 1990); FRSSAf, ASSAf
Experience: 32 years research; 24 years PIA studies

Declaration of Independence

This report has been compiled by Professor Marion Bamford, of the University of the Witwatersrand, sub-contracted by Mary Chettle & Associates, South Africa. The views expressed in this report are entirely those of the author and no other interest was displayed during the decision making process for the Project.

Specialist: Prof Marion Bamford

Signature:

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

Executive Summary

A Palaeontological Impact Assessment was requested for the proposed Wembezi Shopping Centre on Portion 51 of Farm Klipplaat Drift 1009, northeast of Wagondrift Dam, east of Wembezi B, near Estcourt, Kwa-Zulu Natal.

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 potentially fossiliferous rocks of the Normandien Formation (Beaufort Group, Karoo Supergroup), that might preserve fossil plant impressions of the upper Permian *Glossopteris* flora). The land, however, is covered with deep soils that have been ploughed and cultivated for several generations. Fossils do not occur in soils and would not have survived the agricultural practices even if they were originally present. Fossils may occur in shales below ground but this would be apparent only once excavations for amenities and foundations have commenced. Therefore, a Fossil Chance Find Protocol has been added to this report. If fossils are found by the Environmental Officer or other responsible person once excavations have commenced, then they should be photographed *in situ*, put aside and a palaeontologist contacted to assess their scientific importance, and collect a representative sample. Based on this information it is recommended that no palaeontological site visit is required unless fossils are found, and that the project be authorised.

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1. Background

DLM African Trading is proposing to establish a shopping centre, the Wembezi Shopping Centre, on Portion 51 of Farm Klipplaat Drift 1009 (Figures 1, 2). The land belongs to the Klipplaat Family Trust and is located northeast of Wagondrift Dam and just east of Wembezi B township, alongside the road, near Estcourt. At present, the land is under cultivation and irrigation.

A Palaeontological Impact Assessment was requested for the Wembezi Shopping Centre project. In order 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: Specialist report requirements in terms of Appendix 6 of the EIA Regulations (amended 2017)

	A specialist report prepared in terms of the Environmental Impact Regulations of 2017 must contain:	Relevant section in report
ai	Details of the specialist who prepared the report	Appendix B
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 0

DECLARATION OF INTEREST BY SPECIALIST

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	Section 8
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 7
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	N/A
o	A description of any consultation process that was undertaken during the course of carrying out the study	N/A
p	A summary and copies if any comments that were received during any consultation process	N/A
q	Any other information requested by the competent authority.	N/A



Figure 1: Google Earth map of the site for the proposed Wembezi Shopping Centre (yellow outline) on Portion 51 of Farm Klipplaat Drift 1009, Estcourt.



Figure 2: Details of proposed Wembezi shopping centre on Farm Klipplaat Drift 1009.

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*).

3. Geology and Palaeontology

i. Project location and geological context



Figure 3: Geological map of the area around the Farm Klipplaat Drift. The location of the proposed project is indicated within the yellow rectangle. Abbreviations of the rock types are explained in Table 2. Map enlarged from the Geological Survey 1: 250 000 map 2928 Drakensberg.

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

Symbol	Group/Formation	Lithology	Approximate Age
Qm	Quaternary	Alluvium, sand, calcrete	Neogene, ca 2.5 Ma to present
Jd	Jurassic dykes	Dolerite dykes, intrusive	Jurassic, approx. 180 Ma
Pes	Normandien Fm (formerly Estcourt Fm), Beaufort Group, Karoo SG	Shales, sandstone, coal	Upper Permian, ca 240-250 Ma

The site is in the eastern part of the Main Karoo Basin (Figure 3). Karoo Supergroup rocks cover a very large proportion of South Africa. 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. 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. They comprise tillites, diamictites, mudstones, siltstones and sandstones that were deposited as the basin filled (Johnson et al., 2006).

Overlying the Dwyka Group rocks are rocks of the Ecca Group that are Early Permian in age. There are eleven formations recognised in this group but they do not all extend throughout the Karoo Basin. All of these sediments have varying proportions of sandstones, mudstones, shales and siltstones and represent shallow to deep water settings, deltas, rivers, streams and overbank depositional environments.

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. In this area the **Normandien Formation** (formerly known as the Estcourt Formation), is the dominant rock group.

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.

Cenozoic colluvial deposits are widespread in South Africa and are thin layers of talus, colluvial gravel or hillwash deposits on hillslopes (Partridge et al., 2006). They were the product of erosion but in some areas, these sediments have accumulated. For example, in central and northern KwaZulu Natal, the Eastern Cape and the southeast of Mpumalanga these unconsolidated colluvial deposits have buried bedrock pediments on lower hillslopes and are known as the Masotcheni Formation. They range in age from 107 000 – 46 000 years old (Botha et al., 1994).

ii. Palaeontological context

The palaeontological sensitivity of the area under consideration is presented in Figure 4. The site for development is in the Normandien Formation that is known to preserve fossils of the *Glossopteris* flora. These are in the form of impressions or compression of leaves and reproductive structures of *Glossopteris* (an extinct seed-fern), cordaitaleans, early gymnosperms, ferns, sphenophytes, lycopods and plants of unknown affinity (Plumstead, 1969; Anderson and Anderson, 1985; Prevec et al., 2009). Vertebrate fossils seldom occur with fossil plants as the conditions for preservation are different, with plants requiring a reducing environment and bones an oxidizing environment.

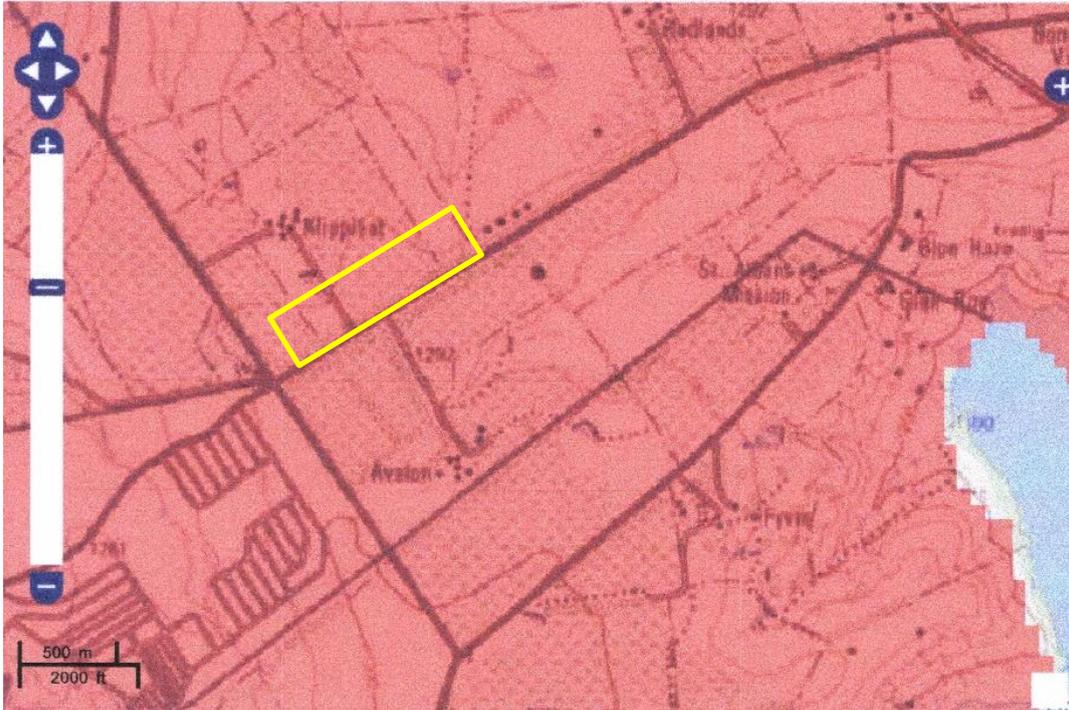


Figure 3: SAHRIS palaeosensitivity map for the site for the proposed Wembezi Shopping Centre shown within the yellow rectangle. Background colours indicate the following degrees of sensitivity: red = very highly sensitive; orange/yellow = high; green = moderate; blue = low; grey = insignificant/zero.

From the SAHRIS map (Figure 4), the area is indicated as very highly sensitive (red) so a site visit would usually be required, however, the area is covered with deep soils that have been ploughed, cultivated and irrigated for many generations.

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.

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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 any fossils; so far there are no records from the Normandien formation of plant or animal fossils in this region so it is very unlikely that fossils occur on the site. The impact would be very unlikely.
	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 fossil plants from the <i>Glossopteris</i> flora in the shales, 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 sands and soils that have been ploughed and cultivated. There might be fossils in the shales below the soils, therefore a Fossil Chance Find Protocol has been added to the report.

Based on the nature of the project, surface activities may impact upon the fossil heritage if preserved in the development footprint. The geological structures suggest that the rocks are the correct age and type to contain fossils of the *Glossopteris* flora in the Normandien Formation BUT the site is covered with soils. Soils are highly weathered sediments with an organic component and this does not preserve fossils. Furthermore, the soils have been ploughed, cultivated and irrigated so even if fossils were present they would have been destroyed years ago. Since there is a very small chance that fossils from the Normandien Formation occur below the soils 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 extremely low.

5. Assumptions and uncertainties

Based on the geology of the area and the palaeontological record as we know it, it can be assumed that the formation and layout of the dolomites, sandstones, shales and sands are typical for the country and might contain fossil plant, insect, invertebrate and vertebrate material. There have been no reports from here, but fossil plants have been recovered from near Colenso but they were in an eroded riverbed, some 2-4m below the surrounding land surface (Prevec et al., 2009). The overlying 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 ploughed soils that cover the entire project site. There is a very small chance that fossils may occur below the soils in the shales of the late Permian Estcourt Formation so a Fossil Chance Find Protocol has been added to the PIA report. If fossils are found once excavations for amenities and foundations have commenced then they should be photographed, rescued and a palaeontologist called to assess and collect a representative sample.

7. References

Anderson, J.M., Anderson, H.M., 1985. Palaeoflora of Southern Africa: Prodrum of South African megaflores, Devonian to Lower Cretaceous. A.A. Balkema, Rotterdam. 423 pp.

Botha, G.A., Wintle, A.G., Vogel, J.C., 1994. Episodic late Quaternary palaeogully erosion in northern KwaZulu Natal, South Africa. *Catena* 23, 327-340.

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.

Prevec, R, Labandeira, C.C., Neveling, J., Gastaldo, R.A., Looy, C., Bamford, M., 2009. Portrait of a Gondwanan ecosystem: A new Late Permian locality from KwaZulu-Natal, South Africa. *Review of Palaeobotany and Palynology* 156, 454-493.

8. Chance Find Protocol

Monitoring Programme for Palaeontology – to commence once the excavations and construction activities begin.

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

Appendix A – Examples of fossils from the Ecca and Beaufort Groups.



Figure 5: Examples of fossil plant impressions from the *Glossopteris* flora, Vryheid Formation. Bottom right shows a bone found in situ.

GROWING KWAZULU-NATAL TOGETHER

Appendix B – Details of specialist

Curriculum vitae (short) - Marion Bamford PhD July 2021

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.

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

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SASQUA (South African Society for Quaternary Research) – 1997+

PAGES - 2008 –onwards: South African representative

ROCEEH / WAVE – 2008+

INQUA – PALCOMM – 2011+onwards

vii) Supervision of Higher Degrees

All at Wits University

Degree	Graduated/completed	Current
Honours	11	0
Masters	10	4
PhD	11	4
Postdoctoral fellows	10	5

viii) Undergraduate teaching

Geology II – Palaeobotany GEOL2008 – average 65 students per year

Biology III – Palaeobotany APES3029 – average 25 students per year

Honours – Evolution of Terrestrial Ecosystems; African Plio-Pleistocene Palaeoecology;

Micropalaeontology – average 2-8 students per year.

ix) Editing and reviewing

Editor: Palaeontologia africana: 2003 to 2013; 2014 – Assistant editor

Guest Editor: Quaternary International: 2005 volume

Member of Board of Review: Review of Palaeobotany and Palynology: 2010 –

Review of manuscripts for ISI-listed journals: 25 local and international journals

x) Palaeontological Impact Assessments

Selected – list not complete:

- Thukela Biosphere Conservancy 1996; 2002 for DWAF
- Vioolsdrift 2007 for Xibula Exploration
- Rietfontein 2009 for Zitholele Consulting
- Bloeddrift-Baken 2010 for TransHex
- New Kleinfontein Gold Mine 2012 for Prime Resources (Pty) Ltd.
- Thabazimbi Iron Cave 2012 for Professional Grave Solutions (Pty) Ltd
- Delmas 2013 for Jones and Wagener
- Klipfontein 2013 for Jones and Wagener
- Platinum mine 2013 for Lonmin
- Syferfontein 2014 for Digby Wells
- Canyon Springs 2014 for Prime Resources
- Kimberley Eskom 2014 for Landscape Dynamics
- Yzermyne 2014 for Digby Wells
- Matimba 2015 for Royal HaskoningDV
- Commissiekraal 2015 for SLR
- Harmony PV 2015 for Savannah Environmental
- Glencore-Tweefontein 2015 for Digby Wells

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- Umkomazi 2015 for JLB Consulting
- Ixia coal 2016 for Digby Wells
- Lambda Eskom for Digby Wells
- Alexander Scoping for SLR
- Perseus-Kronos-Aries Eskom 2016 for NGT
- Mala Mala 2017 for Henwood
- Modimolle 2017 for Green Vision
- Klipportjie 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

xi) Research Output

Publications by M K Bamford up to July 2021 peer-reviewed journals or scholarly books: over 150 articles published; 5 submitted/in press; 10 book chapters.
Scopus h-index = 29; Google scholar h-index = 35; -i10-index = 92
Conferences: numerous presentations at local and international conferences.

xii) NRF Rating

NRF Rating: B-2 (2016-2020)
NRF Rating: B-3 (2010-2015)
NRF Rating: B-3 (2005-2009)
NRF Rating: C-2 (1999-2004)

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KWAZULU-NATAL PROVINCE
 ECONOMIC DEVELOPMENT, TOURISM
 AND ENVIRONMENTAL AFFAIRS
 REPUBLIC OF SOUTH AFRICA

Provincial Reference Number:	(For official use only)
NEAS Reference Number:	KZN / EIA /
Waste Management Licence Number (if applicable):Date Received by Department:	

DETAILS OF SPECIALIST AND DECLARATION OF INTEREST

Submitted in terms of section 24(2) of the National Environmental Management Act, 1998 (Act No. 107 of 1998) or for a waste management licence in terms of section 20(b) of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008).

KINDLY NOTE:

1. This form is current as of May 2021. It is the responsibility of the Applicant / Environmental Assessment Practitioner (“EAP”) to ascertain whether subsequent versions of the form have been released by the Department.

PROJECT TITLE

Wembezi JunXion Commercial Development

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DISTRICT MUNICIPALITY:

uThukela District Municipality

1. SPECIALIST INFORMATION

Specialist name:	Palaeontologist		
Contact person:	Prof Marion Bamford		
Postal address:	P. O. Box 652, WITS		
Postal code:	2050	Cell:	082 555 6937
Telephone:	011 717 6690	Fax:	011 717 6694
E-mail:	Marion.Bamford@wits.ac.za : marionbamford12@gmail.com		
Professional affiliation(s) (if any)	FRSSAf, mASSAf, PSSA,SASQUA, INQUA, IOP		

Department of Economic Development, Tourism & Environmental Affairs, KwaZulu-Natal	Details of the Specialist and Declaration of Interest	May 2021 V1
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Project Consultant / EAP:	Metamorphosis Environmental Consultants		
Contact person:	Ms Vicki King		
Postal address:	P. O. Box 2116, Link Hills		
Postal code:	3625	Cell:	076 420 1441
Telephone:	031 – 756 7554	Fax:	
E-mail:	Vicki@metamorphosisdbn.co.za		
Professional affiliation(s) (if any)	IAIAsa, Reg EAP (EASPAPA), IWM, ELA		

2. DECLARATION BY THE SPECIALIST

I, Marion Bamford

General declaration:

- I act as the independent specialist in this application;
- do not have and will not have any vested interest (either business, financial, personal or other) in the undertaking of the proposed activity, other than remuneration for work performed in terms of the Environmental Impact Assessment Regulations, 2014;
- 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 am aware that a person is guilty of an offence in terms of Regulation 48 (1) of the EIA Regulations, 2014, if that person provides incorrect or misleading information. A person who is convicted of an offence in terms of sub-regulation 48(1) (a)-(e) is liable to the penalties as contemplated in section 49B(1) of the National Environmental Management Act, 1998 (Act 107 of 1998).



Signature of the specialist:

Marion Bamford Consulting

Name of company:

09 February 2022

Date:

Department of Economic Development, Tourism & Environmental Affairs, KwaZulu-Natal	Details of the Specialist and Declaration of Interest	May 2021 V1
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