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21 January 2026

Stephanie Barnardt
Heritage Western Cape
Protea Assurance Building
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RE: PROPOSED SONSKYNVALLEI TO BRANDWACHT POTABLE WATER PIPELINE, MOSSEL BAY: AMENDMENT APPLCATION – HERITAGE INPUT

HWC Case No: HWC22110201AM1102

Dear Stephanie

Background
This project was assessed through an HIA process with report dated 20 January 2023. HWC had requested a specialist palaeontological study which was compiled by Prof. Marion Bamford and dated 19 January 2023. No significant concerns were found and HWC approved the project in a final comment dated 7 March 2023.

As construction drew near, it became apparent that one section of approximately 1000 m would need to be rerouted due a landowner concern. I approached HWC via email to yourself dated 3 December 2025 asking for advice on how to proceed with the matter. Your response, dated 4 December 2025, was that a site visit was recommended and that letter noting any findings should be submitted along with recommendations as might be needed. This letter fulfils this purpose.

Site visit
A site visit to the new 1.15 km long section of pipeline was conduced by Dr Peter Nilssen on 12 January 2026. A track log and site photographs for the new section are shown below. No archaeological materials were noted within the proposed route, although some heritage structures do occur close by in the small hamlet of Brandwag and the road bridge west of the hamlet is older than 60 years. Aside from the bridge, no impacts to any built infrastructure would occur though, because the proposed pipeline would be laid within the road reserve in this area. These properties are enclosed by vibracrete walls. The pipeline will connect to an existing pipe beneath the bridge which means no impact to the bridge structure. Historical aerial photography from 1938 shows that a bridge was present in this location at that time (see image below). It is not possible to determine whether that was the same bridge that occurs there today but, from the photograph of the bridge below, this is entirely possible.

In terms of palaeontology, the specialist study requested by HWC for the HIA, the new section of pipeline would cross exactly the same sediments, but in a different location. As such, there is no change in the

assessment for palaeontology. This is supported by the specialist as per the attached letter from Prof. Marion Bamford). The SAHRIS Palaeosensitivity Map is shown below.

Conclusion and Recommendation

The new section of pipeline route will not result in any significant new impacts to heritage resources. The only resource that would be affected and that was not previously assessed is the road bridge over the Brandwag River. Although this bridge appears to predate 1938, it is not seen as a significant heritage resource as it is of fairly standard construction (concrete deck on concrete pillars) and does not have any obvious architectural or other heritage significance. In any case, significant impacts to this bridge are not expected.

It is thus recommended that HWC approve the amendment and require that their previous comment dated 7 March 2023 continue to stand. This letter and the resulting response from HWC will need to be included in the amendment application.

Yours sincerely

Jayson Orton

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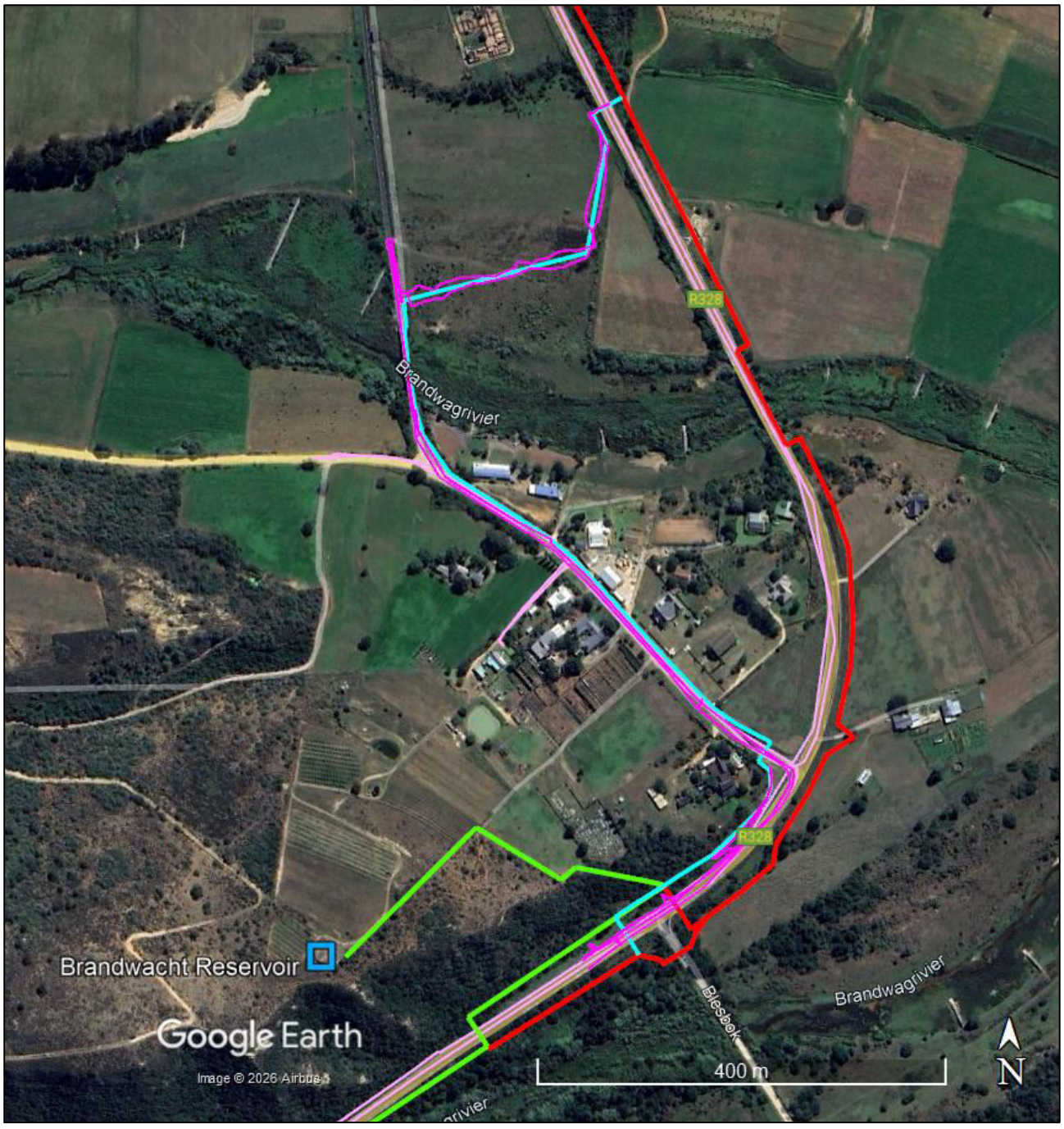

Aerial view showing the original pipeline route in green (Phase 1) and red (Phase 2) The newly proposed section of Phase2 pipeline is shown in turquoise. Survey tracks are in light pink (2022) and dark pink (2026). The bridge of potential concern is where the turquoise line crosses the Brandwag River.

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View towards the north along he R328 just south of Brandwag. The road reserve has grass and bush.

Ground covering immediately south of the road leading into the southern section of Brandwag.

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Road leading into Bradwag. The pipeline would be in the road reserve on the far side of the road.

Road reserve through the southern section of Brandwag. The pipeline would be in the centre of this view. The brown and white building is a historical church, but it has been enlarged in recent times using the identical style to the original structure. The arrowed wing predates 1938, but the remainder under the brace was added later.

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View north across the bridge over the Brandwag River. The pipeline would approach the bridge from the right hand side in this view.

Looking north across the Brandwag River bridge.

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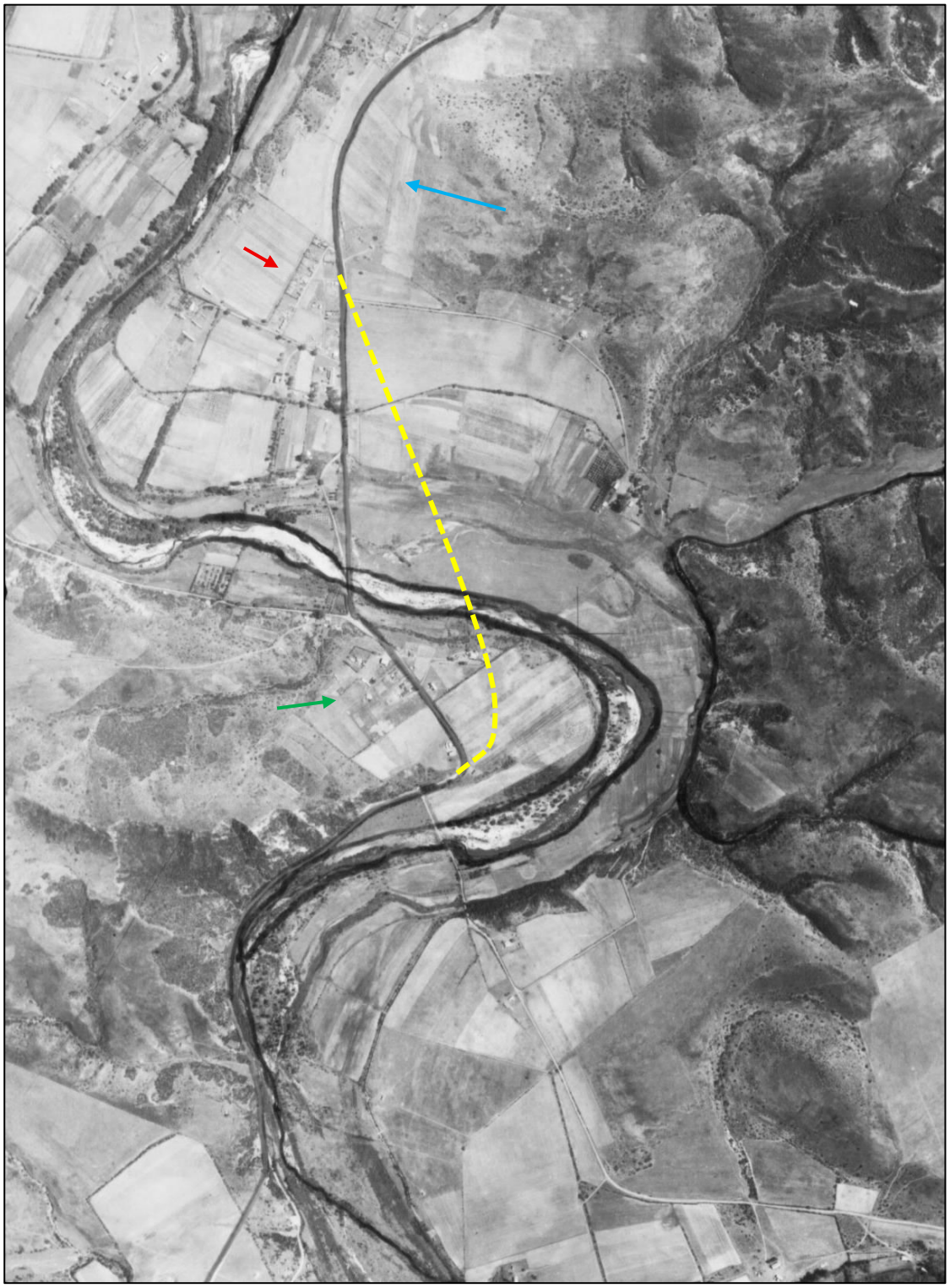
Looking east-northeast across the field where the pipeline would run back towards the R328.

Looking north-northeast through the field towards the R328 which lies atop the road prism in mid-view (arrowed at approximately the point where the pipeline would pass beneath the road and rejoin the previously assessed route).



1938 aerial photograph (140_038_34198) showing that the modern northern section of Brandwag Village on the hillside east of the R328 was absent but a row of houses does occur to the west of the road. and the R328 of the time followed a different alignment. The modern route is shown by yellow dashes.

Extract from the SAHRIS Palaeosensitivity Map showing the site to be of very high sensitivity (red) with patches of moderate sensitivity (green). The blue line shows the previously assessed route, while the new section is shown in yellow.

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12 December 2025

Palaeontological Compliance statement for the Part 2 Amendment for the proposed Sonskynsvallei Pipeline, Western Cape Province

In my capacity as a professional palaeontologist, I am providing a comment on the palaeontological impact assessment in terms of the National Heritage Resources Act (Act 25 of 1999) and the National Environmental Management Act (Act 107 of 1998) which requires that the proposed development must be preceded by the relevant impact assessment, in this case for palaeontology:

Project information

The proposed Sonskynsvallei potable water pipeline, Mossel Bay-Brandwag, Western Cape Province has been approved (**REFERENCE:** 16/3/3/1/D6/29/0002/23 **NEAS:** WCP/EIA/0001224/2023). However, due to landowner issues, a deviation is now proposed and the route for the pipeline will travel westwards of the main road, instead of alongside the main road at the bend at Brandwag (Fig. 1).

In the desktop Palaeontological impact assessment completed in 2023 (Bamford, 2023), I recommended that: "The existing pipeline route and new sections lie on the very highly fossiliferous Uitenhage Group, on the Enon and Kirkwood Formations in particular (late Jurassic to Early Cretaceous). Fossils include plants, silicified wood and vertebrates. Short sections are on the moderately fossiliferous Nanaga Formation Quaternary sands along the river valleys that could have marine shells. No fossils are visible on the surface as most of the route is already highly disturbed but fossil might occur below ground. Therefore, a Fossil Chance Find Protocol should be added to the EMPr. Based on this information it is recommended that no further palaeontological impact assessment is required unless fossils are found by the contractor, environmental officer or other designated responsible person once excavations have commenced. If fossils are found HWC must be notified immediately. The impact will be moderate to low, as far as the palaeontology is concerned"

The proposed deviation will be on the Enon Formation and the Quaternary sands, as was the original route alongside the road (Fig. 2).

Figure 1: Google Earth map of the proposed Sonskynvallei pipeline deviation (blue line).

Geology and Palaeontology

The project footprint lies on the

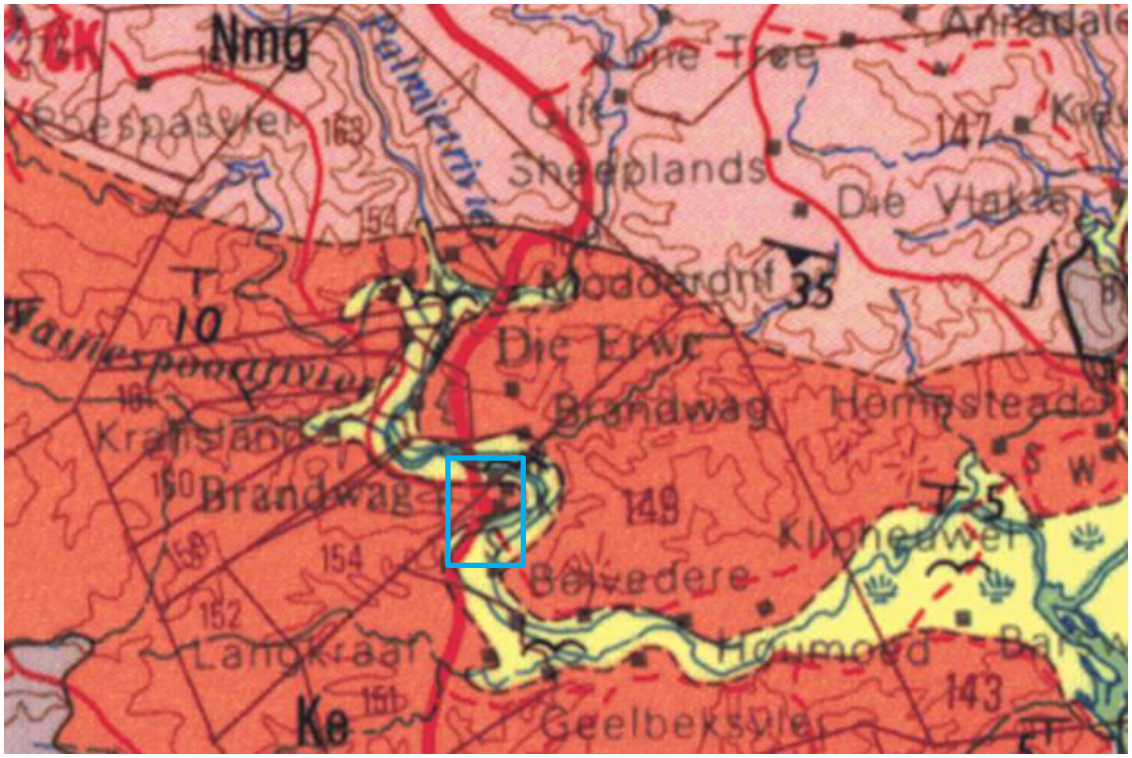


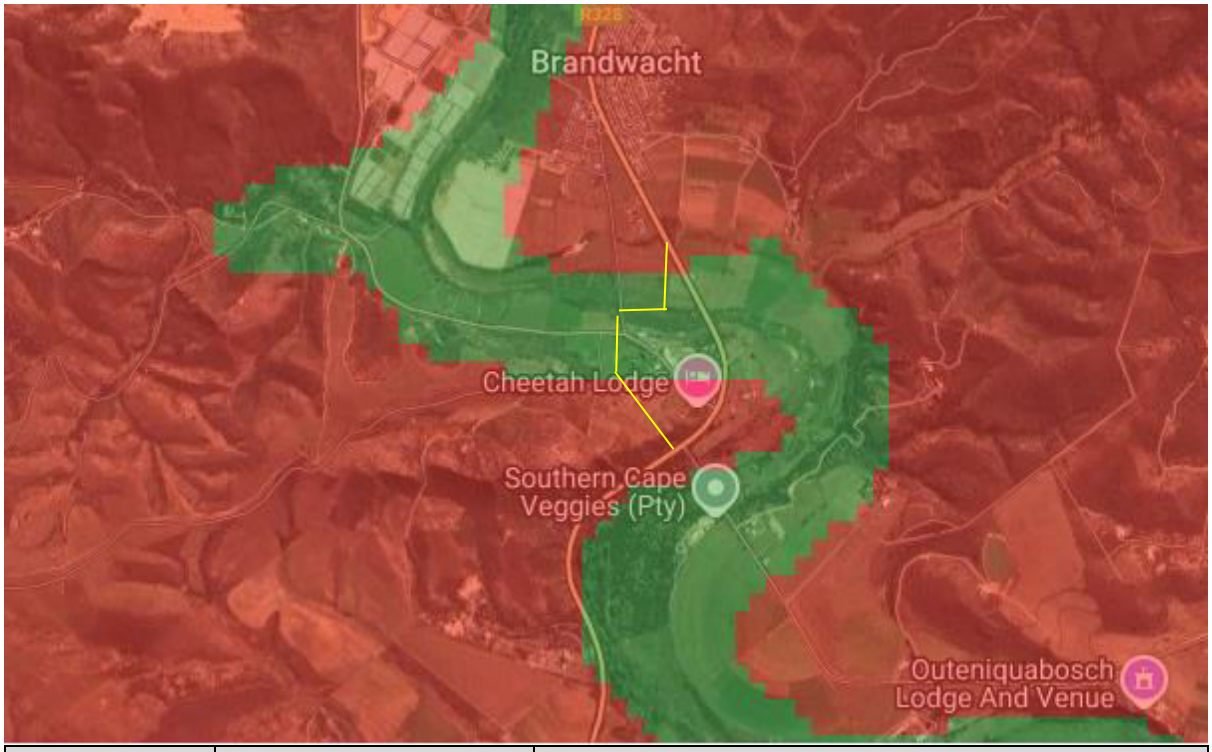
Figure 2: Geology map of the area around the Sonskynvallei Pipeline with the deviation route indicated within the blue outline. Symbols in Table 1 below. Map enlarged from the Council for Geosciences 1:250 000 map 3218 Clanwilliam.

Table 1: Explanation of symbols for the geological map and approximate ages (Roberts et al., 2006; Partridge et al., 2006). SG = Supergroup; Fm = Formation; Ma = million years; grey shading = formations impacted by the project.

Symbol	Group/Formation	Lithology	Approximate Age
Q	Quaternary	Alluvium, sand, calcrete	Quaternary ca 1.0 Ma to Present
Ke	Enon Conglomerate and younger sediments	Clasts, sand, conglomerate	Jurassic-Cretaceous

Palaeosensitivity

According to the online SAHRIS palaeosensitivity map the project lies on very highly sensitive (red) Enon Formation conglomerate and the moderately sensitive (green) Quaternary sands alluvium in the river valley (Fig. 3). Occasionally the conglomerate includes clasts of silicified wood of unknown origin (Shone, 2006), but this area is in farmlands so very disturbed.



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

Figure 3: SAHRIS palaeosensitivity map for the project area with the proposed deviation shown by the yellow line. The previous route was along the main road. Both routes are on

the potentially very highly sensitive (red) Enon Formation and moderately sensitive fluvial sands (green)

The Enon Formation is a dumping category for several indistinguishable formations due to the lack of outcrop and distinctive lithological features so it should not be indicated as very highly sensitive (Shone, 2006).

Since the deviation sensitivity is the same as that of the original route, the recommendation for the first route is still valid: the revised project should be approved.

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

References cited

Bamford, M.K., 2024, 19 Jan. Palaeontological Impact Assessment for the proposed Mossel Bay pipeline upgrade: between Hartenbos and Brandwag, Western Cape Province. Desktop Study (Phase 1) For ASHA Consulting (Pty) Ltd.

Shone, R.W., 2006. Onshore post-Karoo Mesozoic deposits. 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 541-552.

Palaeosensitivity map:
https://sahris.sahra.org.za/map/palaeo

Declaration of Independence

This comment has been compiled by Professor Marion Bamford, (PhD Palaeontology; Wits, 1990; Member of PSSA), sub-contracted by HilLand Environmental (Pty) Ltd, George, 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.