



SOUTH AFRICAN HERITAGE RESOURCES AGENCY
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FOR ATTENTION: **PHRA: Eastern Cape**

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SAHRA File No: **9/2/034/0002**
 Date Received: **8 May 2012**
 Date of Comment: **9 May 2012**
 Sent to Peer Review:
 Date to Peer Review:
 SAHRA Contact Person: **Dr Mariagrazia Galimberti**
 DMR Ref. no: **12/12/20/1569**

REVIEW COMMENT ON PALAEOLOGICAL IMPACT ASSESSMENT

BY ARCHAEOLOGY, PALAEOLOGY AND METEORITES UNIT OF THE SOUTH AFRICAN HERITAGE RESOURCES AGENCY

South Africa has a unique and non-renewable archaeological and palaeontological heritage. Archaeological and palaeontological sites are protected in terms of the National Heritage Resources Act (Act No 25 of 1999) and may not be disturbed without a permit. Archaeological Impact Assessments (AIAs) and Palaeontological Impact Assessments (PIAs) identify and assess the significance of the sites, assess the potential impact of developments upon such sites, and make recommendations concerning mitigation and management of these sites. On the basis of satisfactory specialist reports SAHRA or the relevant heritage resources agency can assess whether or not it has objection to a development and indicate the conditions upon which such development might proceed and assess whether or not to issue permission to destroy such sites.

AIAs and PIAs often form part of the heritage component of an Environmental Impact Assessment or Environmental Management Plan. They may also form part of a Heritage Impact Assessment called for in terms of section 38 of the National Heritage Resources Act, Act No. 25, 1999. They may have other origins. In any event they should comply with basic minimum standards of reporting as indicated in SAHRA Regulations and Guidelines.

This form provides review comment from the Archaeologist of the relevant heritage resources authority for use by Heritage Managers, for example, when informing authorities that have applied to SAHRA for comment and for inclusion in documentation sent to environmental authorities. It may be used in conjunction with Form B, which provides relevant peer review comment.

- A. PROVINCIAL HERITAGE RESOURCES AUTHORITY: **Eastern Cape**
- B. AUTHOR OF THE REPORT: **Dr John Almond**
- C. PALAEOLOGY CONTRACT GROUP: **Naturaviva CC**
- D. CONTACT DETAILS: **P.O. Box 12410, Mill Street, Cape Town, 8010**
- E. DATE OF REPORT: **October 2009**
- F. TITLE OF REPORT: **Palaeontological Impact Assessment: Desktop Study- Proposed Wind Energy Facility Near Cookhouse, Western District Municipality, Eastern Cape Province**
- B. Please circle as relevant: Palaeontological component of **EIA** / EMP / HIA / CMP/
 Other (Specify)
- C. REPORT COMMISSIONED BY (CONSULTANT OR DEVELOPER): **Savannah Environmental (Pty) Ltd, Mr John von Mayer**
- D. CONTACT DETAILS: **P.O. Box 148, Sunninghill, 2157, email: john@savannahsa.com**
- E. COMMENTS:

Please see comment on next page

REVIEW COMMENT ON PALAEOLOGICAL IMPACT ASSESSMENT**Dr J. Almond****Dated: October 2009, Received: May 2012****Proposed wind energy facility near Cookhouse, Western District Municipality, Eastern Cape Province**

ACED Renewable Cookhouse (Pty) Ltd received an environmental authorization for the establishment of a 200-turbine wind energy facility close to Cookhouse in May 2010. The authorization was amended twice on the 1st September 2011 and on the 3rd of November 2011.

SAHRA first commented on the archaeological impact assessment for this project on the 20th of July 2010, but no palaeontological assessment was submitted with the archaeological specialist study. The palaeontological impact assessment was submitted to SAHRA on the 8th of May 2012.

The area where the wind energy facility is proposed is underlain by the Adelaide Subgroup, Lower Beaufort Group of the Karoo Supergroup with intrusions of Karoo dolerite, in turn overlain by Cenozoic alluvium. The high palaeontological significance of the Balfour Formation is linked to a mass extinction event at the end of the Permian, which is recorded here by the abundant presence of fossils of articulated skeletons of vertebrates, both terrestrial and aquatic, freshwater bivalves, trace fossils and vascular plant remains. The Karoo dolerite is, by its origin, unfossiliferous. Cenozoic alluvium may contain some animal and plant fossils of importance but their occurrence is quite rare.

Considering the high palaeontological significance of the area earmarked for this development, a palaeontological impact assessment, inclusive of a site visit, should have been commissioned at the early stage of the process and not after the environmental authorization has already been received.

Considering the information above, SAHRA requires that:

- A palaeontological impact assessment inclusive of a field survey must be undertaken before any construction activities start. The report must be submitted to SAHRA for comments. Monitoring by a palaeontologist may be necessary during construction but this will be informed by the Palaeontological Impact Assessment compiled after the field survey.
- If any new evidence of palaeontological resources (e.g., fossilized shell or wood, large animal teeth, corals) are encountered during construction activities in the absence of a palaeontologist, SAHRA APM Unit (Colette Scheermeyer/ Mariagrazia Galimberti, Tel: 021-4624502) must be alerted immediately, and a professional palaeontologist must be contacted as soon as possible to inspect the findings.

SIGNATURE OF ARCHAEOLOGIST PROCESSING REPORT: *M Galimberti*

EMAIL: mgalimberti@sahra.org.za

SIGNATURE OF SAHRA HEAD ARCHAEOLOGIST: *PP*

EMAIL: cscheermeyer@sahra.org.za

NAME OF HERITAGE RESOURCES AGENCY: SAHRA

PLEASE NOTE THAT THE COMMENT (ABOVE OR APPENDED) CONSTITUTES THE COMMENT OF THE HERITAGE RESOURCES AGENCY ARCHAEOLOGIST AND THAT ANY DEVELOPMENT THAT INVOLVES DESTRUCTION OF ANY ARCHAEOLOGICAL/PALAEONTOLOGICAL SITE IS STILL SUBJECT TO A PERMIT/PERMISSION FOR DESTRUCTION OF SUCH SITE GIVEN TO THE DEVELOPER BY THE RELEVANT HERITAGE RESOURCES AGENCY ARCHAEOLOGICAL AND PALAEONTOLOGICAL PERMIT COMMITTEE.