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THE HERITAGE OFFICER

South African Heritage Resources Agency

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SAHRA File No: 9/2/066/0001

DEA Ref No: 12/12/20/1832

**PALAEONTOLOGICAL ASSESSMENT OF PORTION 4 OF SCUIT-KLIP 92
KHAI-MA MUNICIPALITY, KENHARDT DISTRICT, NORTHERN CAPE
KAXU AND XINA SOLAR POWER PLANTS
ABENGOA SOLAR POWER SOUTH AFRICA (PTY) LTD.**

A desktop Palaeontological Impact Assessment (PIA) of this property has been prepared at the request of Savannah Environmental (Pty) Ltd., viz:

Pether, J. 2010. Brief Palaeontological Impact Assessment (Desktop Study). Proposed Pofadder Solar Thermal Plant. Portion 4 of the Farm Scuit-Klip 92, Kenhardt District, Northern Cape. 3 December 2010. For Savannah.

The Abengoa KaXu and XiNa solar energy facilities are both situated on Portion 4 of Scuit-Klip 92 adjacent to each other.

The property is a triangular area straddling a sediment-choked drainage line that traverses the gentle decline from the Bushmanland Plateau down towards the Gariep River. The drainage is an almost flat plain crossed by ephemeral, braided stream flows that converge in the north and smaller-scale local flow features produced in a sheetflood and flashflood sediment-transport regime.

The PIA mentioned that ephemeral watercourse deposits are poorly fossiliferous, but abraded bone fragments and loose teeth may occur sparsely in channel lags. It was mentioned that very few fossils have been found. Hence, though of low probability, any find will be considerable importance.

In the recommendations it was concluded that, in view of the low fossil potential, monitoring of bulk earth works by a specialist was not justified. It was recommended that a requirement to be alert for possible fossils be included in the EMP for the Construction Phase. This should include guidelines for potential finds and a reporting/action protocol for when finds are uncovered.

The desktop PIA and an AIA by Mr David Morris (McGregor Museum, Kimberley) were submitted to SAHRA by Savannah Environmental and the review comment by SAHRA (File No. 9/2/066/0001) pertains.

The review echoes to the effect that fossils are scarce and thus fossil finds will be important. It then opines "However, despite this, it is the opinion of the palaeontologist specialist that a full palaeontological impact assessment on the field is undertaken".

I humbly submit that this was in error as the PIA concluded such was not justified.

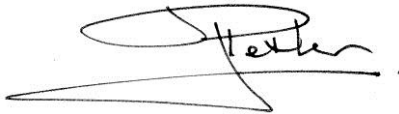
The Sahra recommendation "A palaeontologist must be present on site during bulk excavation." is thus not necessary.

Similarly, "If this is not deemed feasible, the the palaeontologist must assure the presence of a trained surveyor who is able to identify fossil material." is also not considered necessary.

It is noteworthy that other independent PIAs for solar power installations in similar terrains in the Northern Cape do not recommend monitoring by a palaeontologist, such as those prepared by Dr John Almond.

In compliance with the SAHRA recommendation, a Fossil Finds Procedure for inclusion in the Construction Phase EMP is supplied.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'J. Pether', with a large, sweeping horizontal stroke underneath.

John Pether