



PALAEONTOLOGICAL IMPACT
ASSESSMENT

GRID CONNECTION

INFRASTRUCTURE FOR THE
AUTHORISED SONVANGER

PHOTOVOLTAIC SOLAR ENERGY
FACILITY NEAR THEUNISSEN, FREE
STATE PROVINCE

2023

COMPILED FOR:

ENVIRONAMICS ENVIRONMENTAL



Declaration of Independence

I, Elize Butler, declare that –

General declaration:

- I act as the independent palaeontological 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 favorable to the applicant
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting palaeontological impact assessments, 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 will take into account, to the extent possible, the matters listed in section 38 of the NHRA when preparing the application and any report relating to the application;
- 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;
- I will ensure that information containing all relevant facts in respect of the application is distributed or made available to interested and affected parties and the public and that participation by interested and affected parties is facilitated in such a manner that all interested and affected parties will be provided with a reasonable opportunity to participate and to provide comments on documents that are produced to support the application;
- I will provide the competent authority with access to all information at my disposal regarding the application, whether such information is favorable to the applicant or not
- All the particulars furnished by me in this form are true and correct;
- I will perform all other obligations as expected a palaeontological specialist in terms of the Act and the constitutions of my affiliated professional bodies; and
- I realize that a false declaration is an offense in terms of regulation 71 of the Regulations and is punishable in terms of section 24F of the NEMA.

Disclosure of Vested Interest



I do not have and will not have any vested interest (either business, financial, personal or other) in the proposed activity proceeding other than remuneration for work performed in terms of the Regulations.

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SIGNATURE:



The Palaeontological Impact Assessment Report has been compiled considering the National Environmental Management Act 1998 (NEMA) and Environmental Impact Regulations 2014 as amended, requirements for specialist reports, Appendix 6, as indicated in the table below.

Table 1: Checklist for Specialist studies conformance with Appendix 6 of the EIA Regulations of 2014 (as amended).

Requirements of Appendix 6 – GN R326 EIA Regulations of 7 April 2017	The relevant section in the report	Comment where not applicable
1.(1) (a) (i) Details of the specialist who prepared the report	Page ii and Section 3 of Report – Contact details and company and Appendix A	-
(ii) The expertise of that person to compile a specialist report including a curriculum vita	Section 3 – refer to Appendix A	-
(b) A declaration that the person is independent in a form as may be specified by the competent authority	Page ii of the report	-
(c) An indication of the scope of, and the purpose for which, the report was prepared	Section 5 – Objective	-
(cA) An indication of the quality and age of base data used for the specialist report	Section 6 – Geological and Palaeontological history	-
(cB) A description of existing impacts on the site, cumulative impacts of the proposed development and levels of acceptable change	Section 11	-
(d) The duration, date and season of the site investigation and the relevance of the season to the outcome of the assessment	Section 1;10 & 12	



(e) A description of the methodology adopted in preparing the report or carrying out the specialised process inclusive of equipment and modelling used	Section 8 Approach and Methodology	-
(f) Details of an assessment of the specifically identified sensitivity of the site related to the proposed activity or activities and its associated structures and infrastructure, inclusive of a site plan identifying site alternative	Section 1;10 & 12	
(g) An identification of any areas to be avoided, including buffers	Section 1 & 12	
(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	Section 6 – Geological and Palaeontological history	
(i) A description of any assumptions made and any uncertainties or gaps in knowledge	Section 8 – Assumptions and Limitation	-
(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 1 and 12	
(k) Any mitigation measures for inclusion in the EMPr	Section 13	
(l) Any conditions for inclusion in the environmental authorisation	Section 13	
(m) Any monitoring requirements for inclusion in the EMPr or environmental authorisation	Section 13	
(n)(i) A reasoned opinion as to whether the proposed activity, activities or portions thereof should be authorised and	Section 1 & 12	
(n)(iA) A reasoned opinion regarding the acceptability of the proposed activity or activities; and		



(n)(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 1 and 12	-
(o) A description of any consultation process that was undertaken during the course of carrying out the study	N/A	Not applicable. A public consultation process was handled as part of the Environmental Impact Assessment (EIA) and Environmental Management Plan (EMP) process
(p) A summary and copies of any comments that were received during any consultation process	N/A	Not applicable. To date, no comments regarding heritage resources that require input from a specialist have been raised
(q) Any other information requested by the competent authority	N/A	Not applicable.



(2) Where a government notice 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	Section 4 compliance with SAHRA guidelines	
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EXECUTIVE SUMMARY

Banzai Environmental was appointed by Environamics Environmental Consultants to conduct the Palaeontological Impact Assessment (PIA) to assess the proposed Grid Connection Infrastructure for the authorised Sonvanger Photovoltaic Solar Energy Facility near Theunissen, Free State Province. In accordance with the National Environmental Management Act 107 of 1998 (NEMA) and to comply with the National Heritage Resources Act (No 25 of 1999, section 38) (NHRA), this PIA is necessary to confirm if fossil material could potentially be present in the planned development area, to evaluate the potential impact of the proposed development on the Palaeontological Heritage and to mitigate possible damage to fossil resources.

The majority of the proposed grid infrastructure development is underlain by Jurassic dolerite, while a portion in the northern section is underlain by Quaternary sands. However, a small portion of the 200m grid corridor is underlain by Permian aged sandstone and shale of the Adelaide Subgroup (Beaufort Group, Karoo Supergroup). According to the PalaeoMap of the South African Heritage Resources Information System (SAHRIS) the Palaeontological Sensitivity of Quaternary sands is Moderate, that of the Adelaide Subgroup (Beaufort Group) is Very High while the Palaeontological Sensitivity of Jurassic dolerite is Zero (Almond and Pether, 2009; Almond *et al.*, 2013, Groenewald et al 2014). Updated Geology (Council of Geosciences) refined the geological maps and indicate that the proposed development is underlain by alluvium, colluvium, elluvium and gravel as well as the Karoo Dolerite Suite. This map also indicates that a portion of the Sonvanger grid connection and corridor is underlain by the Balfour Formation (Adelaide Subgroup, Beaufort Group, Karoo Supergroup). The Very High Palaeontological Sensitivity of the Balfour Formation triggered a site investigation of these areas.

A site-specific field survey of the Balfour Formation in the development footprint was conducted on foot and by motor vehicle on 19 April 2023. No fossiliferous outcrop was detected in the proposed development area. This could be attributed to the extensive dolerite intrusions that metamorphized potentially fossiliferous Beaufort sediments, low relief of the development area as well as poor bedrock exposure and relative unfossiliferous superficial sediments. However, it must be emphasised that the presence of well-preserved fossils is not ruled out.

Based on the site investigation as well as desktop research it is concluded that fossil heritage of scientific and conservational interest in the Sonvanger grid connection infrastructure footprint is relatively rare. The apparent rarity of fossil heritage in the proposed development footprint suggests that the impact of the development will be of a Low significance in palaeontological terms. It is therefore considered that the proposed development will not lead to damaging impacts on the palaeontological resources of the area. The construction of the development may thus be permitted in its whole extent, as the development footprint is not considered sensitive in terms of palaeontological resources.

Recommendations:



- The ECO for this project must be informed that the Adelaide Subgroup (Beaufort Group, Karoo Supergroup) has a **Very High Palaeontological Sensitivity**.
- If Palaeontological Heritage is uncovered during surface clearing and excavations, the **Chance find Protocol** attached should be implemented immediately. Fossil discoveries ought to be protected and the ECO/site manager must report to South African Heritage Resources Agency (SAHRA) (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za) so that mitigation (recording and collection) can be carried out.
- Before any fossil material can be collected from the development site, the specialist involved would need to apply for a collection permit from SAHRA. Fossil material must be housed in an official collection (museum or university), while all reports and fieldwork should meet the minimum standards for palaeontological impact studies proposed by SAHRA (2012).
- These recommendations should be incorporated into the Environmental Management Plan for the Sonvanger SPP grid connection infrastructure.



Impact Summary

Environmental parameter	Issues	Rating prior to mitigation	Average	Rating post mitigation	Average
Planning Phase Sonvanger Grid infrastructure	No Impact	0	No Impact	0	No Impact
Construction Stage Sonvanger Grid infrastructure	Destroy or permanently seal-in fossils at or below the surface that are then no longer available for scientific study	48	Negative Medium impact	16	Negative Low impact
Operational Phase Sonvanger Grid infrastructure	No Impact	0	No Impact	0	No Impact
Decommissioning Sonvanger Grid infrastructure	No Impact	0	No Impact	0	No Impact

It is therefore considered that the proposed Sonvanger SPP grid connection infrastructure will not lead to detrimental impacts on the palaeontological reserves of the area. From a Palaeontological point of view the construction of the development may be authorised in its whole extent.



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1. INTRODUCTION

Environamics Consultants has been appointed to conduct the Basic Assessment Process to obtain Environmental Authorisation for the proposed grid connection infrastructure of the authorised Sonvanger Photovoltaic (PV) Solar Energy Facility (**Figure 1-2**). The Sonvanger PV facility is located on Portion 1 of the Farm Karreebooms Valleï 258, Registration Division Theunissen, Free State Province within the jurisdiction of the Masilonyana Local Municipality.

The development includes a 132kV single-circuit overhead power line (and the associated service road) and 132kV substation/switching station within a 200m wide corridor, to connect the Sonvanger PV Solar Power Plant to the existing Joel-Oryx 132kV Line. The line is approximately 22km long.

The assessment considers a 200m wide corridor within which the power line will be placed, as well as a larger development area within which the 132kV substation/switching station will be placed.

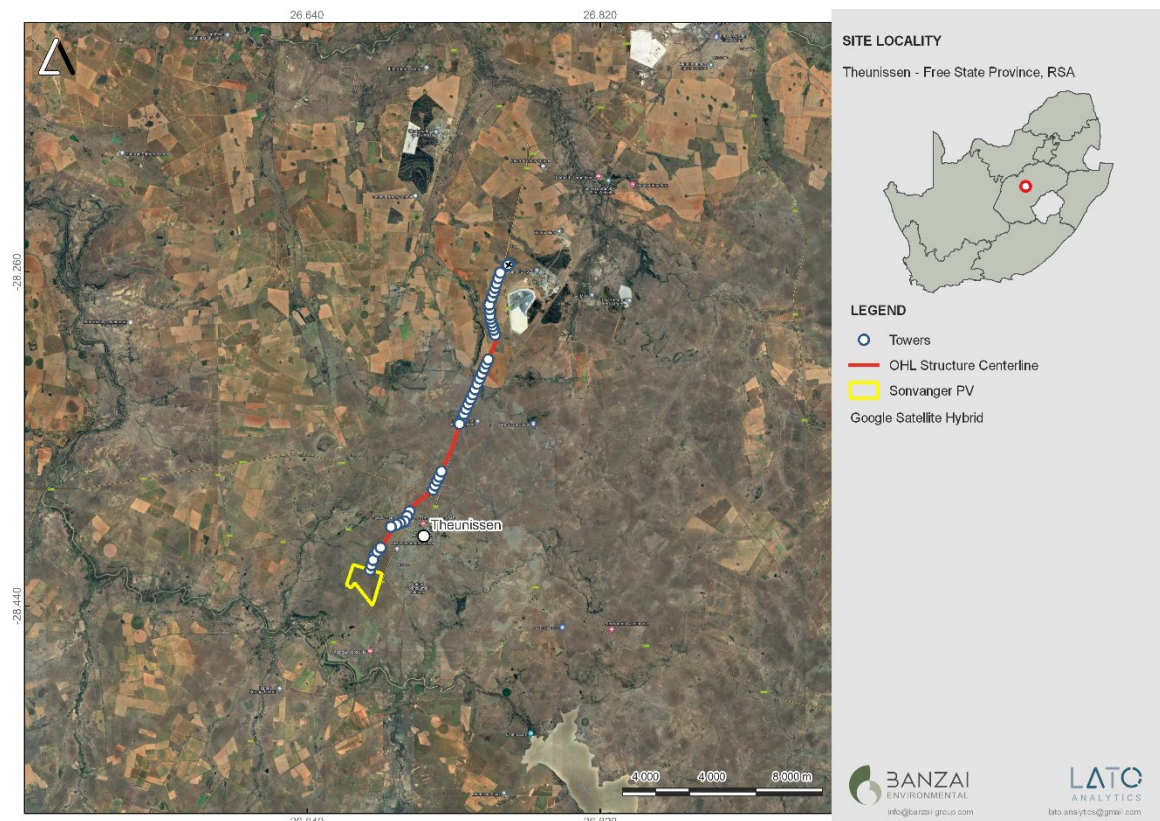


Figure 1: Regional locality of the proposed Sonvanger grid infrastructure near Theunissen in the Free State Province.

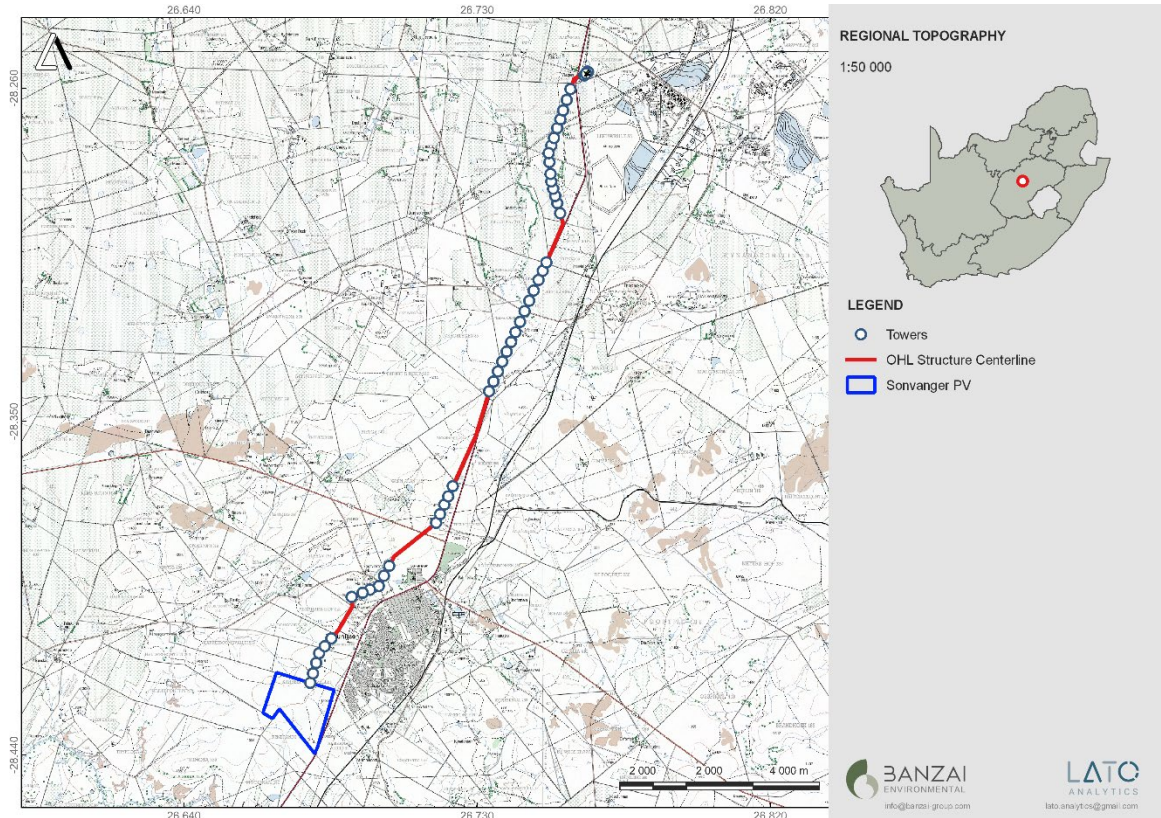


Figure 2: Locality map of Sonvanger grid infrastructure near Theunissen in the Free State Province.



Table 2: General site information

Description of affected farm portion	<p><u>Solar Power Plant</u></p> <p>Portion 1 of the Farm Karreebooms Vallei No. 258 Portion 2 of the Farm Karreebooms Vallei No. 258 Portion 0 of the Farm LaConcorde No. 485 Portion 0 of the Farm Abrahms Hof No. 628 Portion 0 of the Farm Smaldeel No. 262 Portion 0 of the Farm Albany No. 151 Portion 0 of the Farm Glen Alan No. 145 Portion 1 of the Farm Glen Alan No. 145 Portion 0 of the Farm Mooi Hoek No. 297 Portion 0 of the Farm Mamre No. 566 Portion 1 of the Farm Vergelegen No. 85 Portion 0 of the Farm Erfbloem No. 12 Portion 0 of the Farm Grottkau No. 410 Portion 0 of the Farm Silesia No. 409 Portion 0 of the Farm Leeuwvlei No. 115 Portion 1 of the Farm Leeuwvlei No. 115 Portion 2 of the Farm Goedemoed No. 143 Portion 0 of the Farm Excelsior No. 147 Portion 1 of the Farm Excelsior No. 147 Portion 0 of the Farm Vlakpan No. 358 Portion 0 of the Farm Mooivlakte No. 199</p>
Province	Free State
District Municipality	Lejweleputswa District Municipality
Local Municipality	Masilonyana Local Municipality and Matjhabeng Local Municipality
Ward numbers	Masilonyana Local Municipality Wards: 6, 7 and 8 Matjhabeng Local Municipality Ward: 24
Closest towns	The town of Theunissen is located approximately 2 km northeast of the proposed development, with the Masilo suburb located directly to the east.
21 Digit Surveyor General codes	<p>Portion 1 of the Farm Karreebooms Vallei No. 258 F03300000000025800001 Portion 2 of the Farm Karreebooms Vallei No. 258 F03300000000025800002 Portion 0 of the Farm LaConcorde No. 485 F03300000000048500000 Portion 0 of the Farm Abrahms Hof No. 628 F03300000000062800000 Portion 0 of the Farm Smaldeel No. 262 F03300000000026200000 Portion 0 of the Farm Albany No. 151 F03300000000015100000 Portion 0 of the Farm Glen Alan No. 145 F03300000000014500000</p>



	Portion 1 of the Farm Glen Alan No. 145 F03300000000014500001 Portion 0 of the Farm Mooi Hoek No. 297 F03300000000029700000 Portion 0 of the Farm Mamre No. 566 F03300000000056600000 Portion 1 of the Farm Vergelegen No. 85 F03300000000008500001 Portion 0 of the Farm Erfbloem No. 12 F0330000000001200000 Portion 0 of the Farm Grottkau No. 410 F03300000000041000000 Portion 0 of the Farm Silesia No. 409 F03300000000040900000 Portion 0 of the Farm Leeuwvlei No. 115 F03300000000011500000 Portion 1 of the Farm Leeuwvlei No. 115 F03300000000011500001 Portion 2 of the Farm Goedemoed No. 143 F03300000000014300002 Portion 0 of the Farm Excelsior No. 147 F03300000000014700000 Portion 1 of the Farm Excelsior No. 147 F03300000000014700001 Portion 0 of the Farm Vlakpan No. 358 F03300000000035800000 Portion 0 of the Farm Mooivlakte No. 199 F03300000000019900000
Type of technology	132 kV single-circuit overhead power line
Structure Height	Power lines ~32m
Length of the power line	Approximately 22km
Grid connection corridor width	Approximately 200m
Substation capacity	132kV substation/switching station
Substation footprint	up to 1 hectare
Power Line Servitude width	Approximately 31m
Service road	Twin track gravel road up to 4m wide

The grid connection corridor is located directly to the west of the town of Theunissen (along the R30 Regional Road), which is in a rural area and characterised by farms, the urban area of Theunissen, linear infrastructure (i.e., roads) and mining activities which includes the Sibanye Stillwater Beatrix Mine. The site survey revealed that the site is currently used for grazing for cattle, maize cultivation and mining activities.



1.1 Technical Details

For the authorised Sonvanger Solar Power Plant to connect to the electrical grid requires transformation of the voltage from 480V to 33kV to 132kV. The normal components and dimensions of a distribution rated electrical substation will be required. Output voltage from the inverter is 480V and this is fed into step up transformers to 132kV. A substation has been authorised to step the voltage up to 132kV, after which the power will be evacuated into the national grid via the new proposed substation and the power line. The grid connection point into the national grid will be the existing Joel-Oryx 132kV Power Line.

- Construction Phase:

The proposed 132 kV overhead power line will be approximately 22km long and will be constructed within the identified grid connection corridor. The minimum vertical clearance to buildings, poles and structures not forming part of the power line must be 3.8m, while the minimum vertical clearance between the conductors and the ground is 6.7m. The minimum distance between trees and shrubs and any bare phase conductor of a 132kV power line must be 4m, allowing for the possible sideways movement and swing of both the power line conductor and the tree or shrub. The structure to be utilised for the power line towers will be informed by the local geotechnical and topographical conditions as well as by specific requirements from Eskom.

The construction of the proposed overhead power line and substation will take approximately 12 months to complete.

- Operation Phase:

The proposed power line and associated servitude will require routine maintenance throughout the operation period.

- Decommissioning Phase:

The photovoltaic solar power plant has a lifespan of between 20 and 30 years from where the facility and its associated infrastructure will be decommissioned or upgraded. If the solar plant is not decommissioned the power line is expected to have a lifespan of more than 40 years (with maintenance) and the infrastructure will only be decommissioned once it has reached the end of life, or if no longer required. Upon decommissioning, the power line would be disassembled, and the components removed from site, and recycled where possible.

1.2 Consideration Of Alternatives

The DEAT 2006 guidelines on ‘assessment of alternatives and impacts’ proposes the consideration of four types of alternatives namely, the no-go, location, activity, and design alternatives. It is, however, important to note that the regulation and guidelines specifically state that only ‘feasible’ and ‘reasonable’ alternatives should be explored. It also recognizes that the consideration of alternatives is an iterative process of feedback between the developer and EAP, which in some instances culminates in a single preferred project proposal.



The following alternatives were considered in relation to the proposed activity and all specialists should also make mention of these:

No-go alternative

This alternative considers the option of ‘do nothing’ and maintaining the status quo. The grid connection corridor and substation development area and the surrounding areas is currently zoned for agricultural and mining land uses. Should the proposed activity not proceed, the corridor and substation development area will remain unchanged and will continue to be used for grazing for cattle, cultivation etc. The purpose of the proposed 132kV power line and substation is to connect the authorised Sonvanger Solar Power Plant (SPP) with the National Grid. If the status quo is maintained, the potential opportunity costs in terms of the successful operation of the SPP would be lost, since it will not be able to operate without the power line and substation, which in turn will result in job losses and loss of economic growth in the area.

Location alternatives

This alternative asks the question, if there is not, from an environmental perspective, a more suitable location for the grid connection infrastructure. Only one main route alternative is being considered since this is considered as the most feasible and shortest route to connect the SPP to the National Grid. In the northern section of the grid connection corridor, there are two options being considered.

Refer to the figure.

Furthermore, a larger development area is proposed for assessment within which the substation will be placed. The assessment of a larger area provides the opportunity for avoidance of environmental features by the development footprint of the substation. This area is indicated as the red triangle in the figure below.



Figure 3: Location of the proposed substation.

The proposed power line is approximately 22km long, and the proposed route of the power line is the shortest and technically viable route from the authorised solar energy facility to the National Grid.

Design and layout alternatives

The choice of pylon structure to be used for the power line will be determined in consultation with Eskom and does not significantly affect the environmental impacts of the proposed development as provision has already been made for the visual, avifauna, ecological and heritage impacts of erecting a power line. No defined structure has been confirmed at this stage and will depend on Eskom’s technical requirements. The proposed 132kV line must be constructed according to the authorised standards for a power line approved by Eskom Holdings SOC Ltd. The structure to be utilised for the power line towers will also be informed by the local geotechnical and topographical conditions.

The following alternatives are considered with regards to the proposed structures:

- Steel lattice towers
- Steel monopoles
- Wooden poles

Technology alternatives



The power line will be constructed within the identified grid connection corridor towards the existing Oryx-Joel 132kV power line. The 132kV overhead power line is the only preferred alternative for the evacuation of the generated electricity due to the following reasons:

Overhead Transmission Lines - Overhead lines are less costly to construct than underground lines. Therefore, the preference with overhead lines is mainly on the grounds of cost. Overhead lines allow high voltage operations and the surrounding air provides the necessary electrical insulation to earth. Further, the surrounding air cools the conductors that produce heat due to lost energy (Swingler et al, 2006).

The overall weather conditions in the Free State Province are less likely to cause damage and faults on the proposed overhead transmission power line. Nonetheless, if a fault occurs, it can be found quickly by visual means using a manual line patrol. Repair to overhead lines is relatively simple in most cases and the line can usually be put back into service within a few days. In terms of potential impacts caused by overhead transmission lines include visual intrusion and threats to sensitive habitat (where applicable).

The choice of structure to be used for the power line will be determined in consultation with Eskom once the Engineers have assessed the geotechnical and topographical conditions and decided on a suitable structure which meets the prescribed technical requirements. The choice of structures to be used will not have any adverse impacts on the environment. The line will be constructed according to the authorised standards for a power line approved by Eskom Holdings SOC Ltd.

The following alternatives may be considered for the overhead power line:

Single Circuit Overhead Power Line

The use of single circuit overhead power lines to distribute electricity is considered the most appropriate technology and has been designed over many years for the existing environmental conditions and terrain as specified by Eskom Specifications and best international practice. Based on all current technologies available, single circuit overhead power lines are considered the most environmentally practicable technology available for the distribution of power. This option is considered appropriate for the following reasons:

- More cost-effective installation costs
- Less environmental damage during installation
- More effective and cheaper maintenance costs over the lifetime of the power line.

The use of a single-circuit power line is preferred for the proposed project as it will meet the requirements to evacuate the generated solar electricity from the Sonvanger SPP to the national grid.

Double Circuit Overhead Power Line

Where sensitive environmental features are identified, and there is sufficient justification, Eskom will consider the use of double circuit (placing 2 power lines on either side of the same tower structure) to minimize impacts. However, the use of double-circuiting has a number of technical disadvantages:



- Faults or problems on one power line may mean that the other power line is also disabled during maintenance, and this will affect the quality of supply to an area. Larger and taller towers as well as more towers are required for double-circuit power lines.

The double-circuit overhead power line proves more feasible since the single circuit may not have the capacity to transmit the large amount of electricity generated from the plant and during maintenance the entire plant would not have to be off-line as one of the double circuit lines would still be able to supply electricity.

The use of a double-circuit power line is not currently being considered for the development by the developer.

Underground Transmission Lines - Underground cables have generally been used where it is impossible to use overhead lines for example because of space constraints. Underground cabling of high voltage power lines over long distances is not considered a feasible or environmentally practicable alternative for the following reasons:

- Underground cabling will incur significantly higher installation and maintenance costs.
- It is more difficult and takes longer to isolate and repair faults on underground cables.
- There is increased potential for faulting at the transition point from underground cable to overhead power line.
- Underground cables require a larger area to be disturbed during construction and maintenance operations and hence have a bigger environmental disturbance footprint.
- Underground cabling requires the disturbance of a greater area when it comes to agriculture and other compatible land uses as the entire servitude becomes available for use as opposed to just the area around the towers.

The use of an underground power line is not feasible for the proposed project due to the length of the line, which is ~22km long.



2. LEGAL MANDATE AND PURPOSE OF THE REPORT

The National Environmental Management Act identifies listed activities (in terms of Section 24) which are likely to have an impact on the environment. These activities cannot commence without obtaining an EA from the relevant competent authority. Sufficient information is required by the competent authority to make an informed decision and the project is therefore subject to an environmental assessment process which can be either a Basic Assessment Process or a full Scoping and Environmental Impact Assessment process.

The EIA Regulations No. 324, 325, and 327 outline the activities that may be triggered and therefore require EA. The following listed activities with special reference to the proposed development is triggered:

Table 3: Listed activities

Relevant notice:	Activity No (s)	Description of each listed activity as per project description:
GNR. 327, 07 April 2017	Activity 11(i)	<ul style="list-style-type: none"> • <i>“The development of facilities or infrastructure for the transmission and distribution of electricity (i) outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts.”</i> • The development of a 132kV single-circuit power line (and 132kV substation) is required to enable the connection of the authorised Sonvanger Solar Power Plant (DFFE ref.: 14/12/16/3/3/2/672) to the national grid network. A 200m wide and 22km long grid connection corridor is being assessed for the placement of the power line route and a larger development area is under assessment for the substation. The 132kV power line is proposed to connect into the existing Eskom Oryx-Joel 132kV Power Line.
GNR. 327, 07 April 2017	Activity 12(ii)(a)(c)	<ul style="list-style-type: none"> • <i>“The development of (ii) infrastructure or structures with a physical footprint of 100 square meters or more (a) within a watercourse or (b) within 32 meters of a watercourse, measured from the edge of a watercourse.”</i> • Surface water features, including wetlands and drainage channels, may be present within the grid connection corridor that will need to be crossed by the service road (twin track gravel road up to 4m wide).
GNR. 327, 07 April 2017	Activity 19	<ul style="list-style-type: none"> • <i>“The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil sand, shells, shell grit, pebbles or rock of more than 10 cubic meters from a watercourse”.</i>



		<ul style="list-style-type: none"> The power line requires the development of a service road (twin track gravel road up to 4m wide). Surface water features, including wetlands and drainage channels, may be present within the grid connection corridor that will need to be crossed by the service road. This will require the removal and moving of soils of more than 10 cubic meters.
GNR. 327, 07 April 2017	Activity 27	<ul style="list-style-type: none"> <i>“The clearance of 1 hectares or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for (i) the undertaking of a linear activity.”</i> The development of the 132kV substation proposed as part of the project will require the clearance of 1 hectare of indigenous vegetation. <i>* Considering the exclusion related to the activity, this activity is not triggered by the power line and associated service road.</i>

The activities triggered under Listing Notice 1 (Regulation 327) for the project implies that the development is considered as potentially having an impact on the environment and therefore require the implementation of appropriate mitigation measures. Therefore, the project is subject to a Basic Assessment process.

3. QUALIFICATIONS AND EXPERIENCE OF THE AUTHOR

This study has been conducted by Mrs Elize Butler. She has conducted approximately 300 palaeontological impact assessments for developments in the Free State, KwaZulu-Natal, Eastern, Central, and Northern Cape, Northwest, Gauteng, Limpopo, and Mpumalanga. She has an MSc (*cum laude*) in Zoology (specializing in Palaeontology) from the University of the Free State, South Africa and has been working in Palaeontology for more than twenty-eight years. She has experience in locating, collecting, and curating fossils, including exploration field trips in search of new localities in the Karoo Basin. She has been a member of the Palaeontological Society of South Africa (PSSA) since 2006 and has been conducting PIAs since 2014.

4. LEGISLATION

National Heritage Resources Act (25 of 1999)

Cultural Heritage in South Africa, includes all heritage resources, is protected by the National Heritage Resources Act (Act 25 of 1999) (NHRA). Heritage resources as defined in Section 3 of the Act include **“all objects recovered from the soil or waters of South Africa, including archaeological and palaeontological objects and material, meteorites and rare geological specimens”**.



The identification, evaluation and assessment of any cultural heritage site, artefact or finds in the South African context is required and governed by the following legislation:

- National Environmental Management Act (NEMA) Act 107 of 1998
- National Heritage Resources Act (NHRA) Act 25 of 1999
- Minerals and Petroleum Resources Development Act (MPRDA) Act 28 of 2002
- Notice 648 of the Government Gazette 45421- general requirements for undertaking an initial site sensitivity verification where no specific assessment protocol has been identified.

The next section in each Act is directly applicable to the identification, assessment, and evaluation of cultural heritage resources.

GNR 982 (Government Gazette 38282, 14 December 2014) promulgated under the National Environmental Management Act (NEMA) Act 107 of 1998

- Basic Assessment Report (BAR) – Regulations 19 and 23
- Environmental Impacts Assessment (EIA) – Regulation 23
- Environmental Scoping Report (ESR) – Regulation 21
- Environmental Management Programme (EMPr) – Regulations 19 and 23

National Heritage Resources Act (NHRA) Act 25 of 1999

- Protection of Heritage Resources – Sections 34 to 36
- Heritage Resources Management – Section 38

MPRDA Regulations of 2014

Environmental reports to be compiled for application of mining right – Regulation 48

- Contents of scoping report – Regulation 49
- Contents of environmental impact assessment report – Regulation 50
- Environmental management programme – Regulation 51
- Environmental management plan – Regulation 52

The NEMA (No 107 of 1998) states that an integrated EMP should (23:2 (b)) “...*identify, predict and evaluate the actual and potential impact on the environment, socio-economic conditions and cultural heritage*”.

In agreement with legislative requirements, EIA rating standards as well as SAHRA policies the following comprehensive and legally compatible PIA report have been compiled.

Palaeontological heritage is exceptional and non-renewable and is protected by the NHRA. Palaeontological resources and may not be unearthed, broken moved, or destroyed by any development without prior assessment and without a permit from the relevant heritage resources authority as per section 35 of the NHRA.



This Palaeontological Impact assessment forms part of the Heritage Impact Assessment (HIA) and adhere to the conditions of the Act. According to **Section 38 (1)**, an HIA is required to assess any potential impacts to palaeontological heritage within the development footprint where:

- the construction of a road, wall, power line, pipeline, canal or other similar form of linear development or barrier exceeding 300 m in length.
- the construction of a bridge or similar structure exceeding 50 m in length.
- any development or other activity which will change the character of a site—
- (Exceeding 5 000 m² in extent; or
- involving three or more existing erven or subdivisions thereof; or
- involving three or more erven or divisions thereof which have been consolidated within the past five years; or
- the costs of which will exceed a sum set in terms of regulations by SAHRA or a provincial heritage resources authority
- the re-zoning of a site exceeding 10 000 m² in extent.
- or any other category of development provided for in regulations by SAHRA or a Provincial heritage resources authority.

5. OBJECTIVE

The objective of a Palaeontological Impact Assessment (PIA) is to determine the impact of the development on potential palaeontological material at the site.

According to the “SAHRA APM Guidelines: Minimum Standards for the Archaeological and Palaeontological Components of Impact Assessment Reports” the aims of the PIA are: 1) to **identify** the palaeontological status of the exposed as well as rock formations just below the surface in the development footprint 2) to estimate the **palaeontological importance** of the formations 3) to determine the **impact** on fossil heritage; and 4) to recommend how the developer ought to protect or mitigate damage to fossil heritage.

The terms of reference of a PIA are as follows:

General Requirements:

- Adherence to the content requirements for specialist reports in accordance with Appendix 6 of the EIA Regulations 2014, as amended;
- Adherence to all applicable best practice recommendations, appropriate legislation and authority requirements;
- Submit a comprehensive overview of all appropriate legislation, guidelines;
- Description of the proposed project and provide information regarding the developer and consultant who commissioned the study,



- Description and location of the proposed development and provide geological and topographical maps
- Provide palaeontological and geological history of the affected area.
- Identification of sensitive areas to be avoided (providing shapefiles/kmls) in the proposed development;
- Evaluation of the significance of the planned development during the Pre-construction, Construction, Operation, Decommissioning Phases and Cumulative impacts. Potential impacts should be rated in terms of the direct, indirect and cumulative:
 - a. **Direct impacts** are impacts that are caused directly by the activity and generally occur at the same time and at the place of the activity.
 - b. **Indirect impacts** of an activity are indirect or induced changes that may occur as a result of the activity.
 - c. **Cumulative impacts** are impacting that result from the incremental impact of the proposed activity on a common resource when added to the impacts of other past, present or reasonably foreseeable future activities.
- Fair assessment of alternatives (infrastructure alternatives have been provided):
- Recommend mitigation measures to minimise the impact of the proposed development; and
- Implications of specialist findings for the proposed development (such as permits, licenses etc).

6. GEOLOGICAL AND PALAEOLOGICAL HISTORY

The geology of the proposed Sonvanger grid infrastructure near Theunissen in the Free State Province is depicted on the 1:250 000 Winburg 2826 (1987) Geological Map (Council for Geosciences, Pretoria) (**Figure 4, Table 4**). The majority of the proposed grid infrastructure development is underlain by Jurassic dolerite, while a portion in the northern section is underlain by Quaternary sands (Qs, sands). However, a small portion of the 200m grid corridor is underlain by Permian aged sandstone and shale of the Adelaide Subgroup (Beaufort Group, Karoo Supergroup).

According to the PalaeoMap of the South African Heritage Resources Information System (SAHRIS) the Palaeontological Sensitivity of Quaternary sands is Moderate, that of the Adelaide Subgroup (Beaufort Group) is Very High while the Palaeontological Sensitivity of Jurassic dolerite is Zero (Almond and Pether, 2009; Almond *et al.*, 2013, Groenewald et al 2014) (**Figure 5, Table 5**). Updated Geology (Council of Geosciences) refined the geological maps and indicate that the proposed development is underlain by alluvium, colluvium, elluvium and gravel as well as the Karoo Dolerite Suite. This map also indicates that a portion of the Sonvanger grid connection and corridor is underlain by the Balfour Formation (Adelaide Subgroup, Beaufort Group, Karoo Supergroup) (**Figure 6**).



The Quaternary Era is also known as the “Age of the Mammals” and is preserved on coastal plains (Langebaanweg), cave systems (Makapan), and river gravel terraces (Cornelia), as well as other basins. These deposits have been subdivided in six African Land Mammal Ages, namely Recent, Florisian, Cornelian, Makapanian, Langebaanian, and Namibian (MacRae 1999). Quaternary deposits best known in the Free State is the Florisbad and Cornelia localities. Fossils recovered from these sites include teeth and bones of mammals, fish, reptiles, freshwater mollusks, trace fossils, wood, rhizoliths and diatom floras (Groenewald and Groenewald 2014).

The Virginia/Welkom District is known for the presence of fluvial deposits along the present river courses that are terrestrial sediments and includes diatomite (diatom deposits), calcareous tufa, pedocretes, peats, spring deposits, soils and gravel and other Tertiary calcrete deposits, that is very important for understanding the Early and Late Pliocene period in this region (De Ruiter et al, 2010). The late Cenozoic (Plio-Pleistocene) floodplain deposits (overbank sediments) found near the Sand, Doring-, Vals- and Vet River systems including pan sites, contain confined but abundant mammal vertebrate fossil sites. In 1955, Meiring, described an *in situ* proboscidian fossil (mammoth), comprising of a lower molar, large part of a tusk as well as a proximal portion of an ulna from the Sand River near Virginia. This specimen was found in pebbly channel-fill sediments about 40m above the current riverbed. Originally described as *Archidiskodon scotti* (Meiring 1955) this specimen was later assigned to the Pliocene species *Mammuthus subplanifrons* (Coppens et al. 1978). Later investigations uncovered diverse fauna that include amphibians, birds, fish, reptiles, as well as several proboscideans, perissodactyls and artiodactyls from the same site (De Ruiter 2010).

Terrace gravels above the Vet River, southwest of Welkom have uncovered Pliocene fossils while surveys along the Doring, Vals, Sand and Vet Rivers produced moderately fossiliferous overbank sediments and erosional gullies that comprise of a variety of Quaternary-aged mammals (Brink et al. 1999; De Ruiter et al. 2011) Ancient pan sites, for example near Whites, produced rich Quaternary-aged mammal fossil remains. Quaternary fossils are usually very rare but may also include mammalian teeth and bone, ostrich eggshells, tortoise remains, ostracods, diatoms, and reptilian skeletons, trace fossils include burrows, vertebrate tracks, rhizoliths as well as calcretised termitaria (termite heaps). Plant remains include foliage, pear, wood, pollens. Microfossils and vertebrate remains are often found in Quaternary deposits near water courses and drainage lines.

The superficial deposits (represented by yellow on the geological maps (Qs) are the youngest geological deposits formed during the most recent geological period (approximately 2.6 million years ago to present). Most of the superficial deposits are unconsolidated sediments and consist of clay, gravel, sand, silt, that form relatively thin, discontinuous patches of sediments or larger spreads onshore. These sediments comprise of channel, floodplain and stream deposits, talus gravels and glacial drift sediments. Quaternary deposits are very important because palaeoclimatic changes are reflected in the different geological formations (Hunter et al., 2006). Most geomorphologic features in southern Africa were formed during the climate fluctuations in the Quaternary Era (Maud, 2012). Barnosky (2005) indicated that various warming and cooling events occurred in the Quaternary but states that climatic changes during the Quaternary, specifically the last 1.8 Ma, were the most drastic climate changes relative to all climate variations in the past. Climate variations



that occurred in the Quaternary were both drier and wetter than the present and resulted in changes in river flow patterns, sedimentation processes and vegetation variation (Tooth et al., 2004).

A substantial portion of the proposed Sonvanger grid connection infrastructure is underlain by Jurassic dolerite. The latter is part of the Karoo igneous province that is one of the world's classic continental basalt (CFB) provinces. This province consists of intrusive and extrusive rocks that occur over a large area (Duncan et al, 2006). Generally, the flood basalts do not contribute to prominent volcanic structures, but instead are formed by successive eruptions from a set of fissures that form sub-horizontal lava flows (sills and dykes) varying in thickness. This lava caps the landscape on which they erupted. As the Karoo is an old flood basalt province it is today preserved as erosional fragments of a more extensive lava cap that covered much of southern Africa in the geological past. It is estimated that the Karoo lava outcrop currently covered at least 140 000 km² while it was larger in the past [~2 000 000 km² (Cox 1970, 1972)].

The Karoo Igneous Province contains a large volume of flood basalts as well as silicic volcanic rocks. These units are comprised of rhyodacite and rhyolitic magma and crops out along the Lebombo monocline. Individual units span up to 60 km and sometimes show massive pyroclastic structures and are thus classified as rheoignimbrites. The basal lavas lie conformable on the Clarens Formation but in specific localities sandstone erosion occurred before the volcanic eruptions took place.

Lock *et al* (1974) found evidence in the Eastern Cape that in the early stages of volcanism magma interacted with ground water to produce volcanoclastic deposits as well as phreatic and phreatomagmatic diatremes. Eales *et al* (1984) also found evidence of aqueous environments during early volcanism by the existence of pillow lavas and associated hyaloclastite breccias and thin lenses of fluvial sandstones interbedded with the lowermost magmas.

Underlying the superficial deposits is a series of Karoo sandstones, mudstones, and shales, that was deposited under fluvial environments of the Adelaide Subgroup (Beaufort Group). The Beaufort Group is the third of the main subdivisions of the Karoo Supergroup. The Beaufort group overlays the Ecca Group and consists essentially of sandstones and shales, deposited in the Karoo Basin from the Middle Permian to the early part of the Middle Triassic periods and was deposited on land through alluvial processes. The Beaufort Group covers a total land surface area of approximately 200 000 km² in South Africa and is the first fully continental sequence in the Karoo Supergroup and is divided into the Adelaide subgroup and the overlying Tarkastad subgroup (**Figure 7**). The Adelaide subgroup rocks are deposited under a humid climate that allowed for the establishment of wet floodplains with high water tables and are interpreted to be fluvio-lacustrine sediments. The Adelaide Subgroup is approximately 5 000m thick in the southeast, but this decreases to about 800m in the centre of the basin which decreases to about 100 to 200m in the north.

The Adelaide Subgroup contains alternating greyish-red, bluish-grey, or greenish grey mudrocks in the southern and central parts of the Karoo Basin with very fine to medium-grained, grey lithofeldspathic sandstones. Thicker sandstones of the Adelaide are usually multi-storey and usually have cut-and-fill features. The sandstones are characterized internally by horizontal lamination together with parting lineation and less frequent trough crossbedding as well as current ripple lamination. The bases of the sandstone units



are extensive beds, while ripple lamination is usually confined to thin sandstones towards the top of the thicker units. The mudrocks of the Adelaide Subgroup usually have massive and blocky weathering. Sometimes desiccation cracks and impressions of raindrops are present. In the mudstones of the Beaufort Group calcareous nodules and concretions occur throughout.

The flood plains of the Beaufort Group (Karoo Supergroup) are internationally renowned for the early diversification of land vertebrates and provide the worlds' most complete transition from early "reptiles" to mammals. The Beaufort Group is subdivided into a series of biostratigraphic units based on its faunal content (Kitching 1977, 1978; Keyser *et al*, 1977, Rubidge 1995, Smith *et al*, 2020; Viglietti 2020) (**Figure 7**). A portion of the proposed development and corridor is underlain by the Balfour Formation (**Figure 6**) which is divided in the *Daptocephalus* (DAZ) which in turn is divided in the upper (younger) *Lystrosaurus maccaigi* - *Moschorhinus* and lower (older) *Dicynodon-Theriongnathus* Subzones (**Figure 8-12**; Viglietti, 2020).

The dicynodont, *Daptocephalus leoniceps* is the main biozone defining fossil of the *Daptocephalus* Assemblage Zone (**Figure 7**). The *Daptocephalus* Assemblage Zone (DaAZ) is characterised by the co-occurrence of the dicynodontoid *Daptocephalus leoniceps*, the therocephalian *Theriongnathus* microps, and the cynodont *Procynosuchus delaharpeae*. The DaAZ comprise of two subzones representing the two distinct faunal assemblages in this assemblage zone. The *Dicynodon* -*Theriongnathus* Subzone (in co-occurrence with *Daptocephalus*) is present in the lower *Daptocephalus* Assemblage Zone while the *Lystrosaurus maccaigi* – *Moschorhinus* kitchingi Subzone (**Figure 8**) is present in the upper DaAZ. The defining taxa of the latter subzone is *L. maccaigi*, *Daptocephalus* and *Moschorhinus*. This Zone is characterized by the co-occurrence of the two therapsids namely *Dicynodon* and *Theriongnathus* (**Figure 8**). The *Daptocephalus* Assemblage Zone of the Beaufort Group shows the greatest vertebrate diversity and includes numerous well-preserved genera and species of dicynodonts, biarmosuchians, gorgonopsian, therocephalian and cynodont therapsid Synapsida. Captorhinid Reptilia are also present while eosuchian Reptilia, Amphibia and Pisces are rarer in occurrence. Trace fossils of vertebrates and invertebrates as well as *Glossopteris* flora plants have also been described.

The *Daptocephalus* Assemblage Zone (AZ) expands into the lower Palingkloof of the Upper Balfour Formation. The lower Palingkloof Member is of special importance as it precedes the Permo-Triassic Extinction Event which destroyed the vertebrate fauna and extinguished the diverse glossopterid plants. The lower *Lystrosaurus declivis* AZ forms part of the Katberg Formation. Fauna and flora from this assemblage zone is rare as few genera survived the Permo-Triassic Extinction Event. The *Lystrosaurus declivis* AZ is characterized by the dicynodont, *Lystrosaurus*, and captorhinid reptile, *Procolophon*, biarmosuchian and gorgonopsian Therapsida that did not survive into the *Lystrosaurus* Assemblage Zone although the therocephalian and cynodont Therapsida are present in moderate quantities. Captorhinid Reptilia is reduced, but this interval is characterised by a unique diversity of oversize amphibians while fossil fish, millipedes and diverse trace fossils have also been recorded.

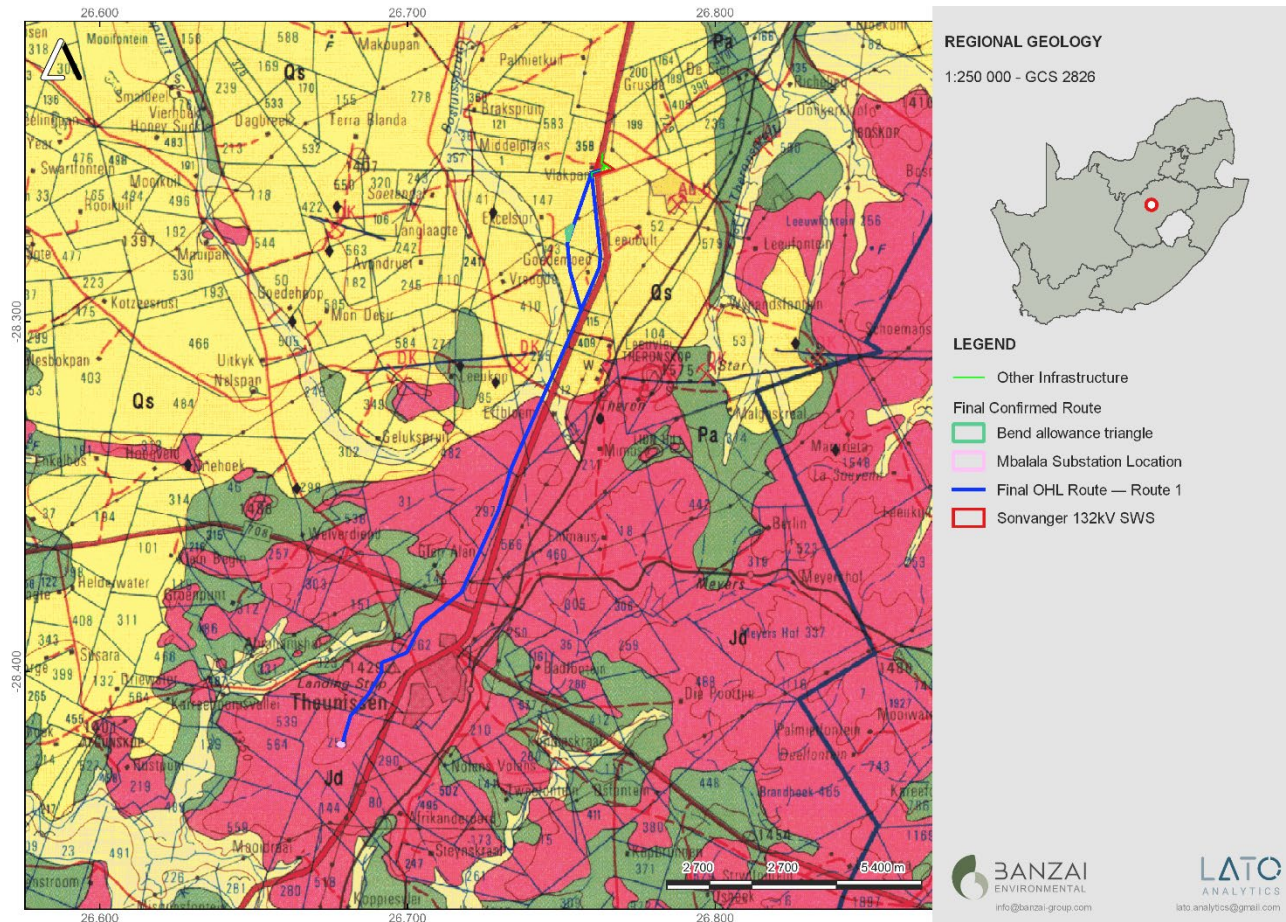


Figure 4: Extract of the 1:250 000 Winburg 2826 (1987) and the Bloemfontein 2926 (1966) Geological Map (Council for Geosciences, Pretoria) indicating the Sonvanger grid infrastructure near Theunissen in the Free State Province.





Table 4: Legend to the 2826 Winburg (1987) Geological Map (Council for Geoscience, Pretoria).
Relevant sediments are indicated in red.

	SUPERGROEP SUPERGROUP	GROEP GROUP	SUBGROEP SUBGROUP	FORMASIE FORMATION	
					Qs
KWARTËR QUATERNARY					Qc
					Jdb
JURA JURASSIC				Drakensberg	Jd
				Clarens	Tc
				Elliot	Te
TRIAS TRIASSIC	KAROO			Molteno	Tm
			Tarkastad		Tt
		BEAUFORT	Adelaide		Pa
PERM PERMIAN		ECCA		Tierberg	Pt



Table 5: Lithology the 2826 Winburg (1987) Geological Map (Council for Geoscience, Pretoria).

Relevant sediments are indicated in red

~	Alluvium; verkalkte alluvium en riviergruis Alluvium; calcified alluvium and river gravel
Qs	Sand; rooi en grys eoliese duinesand Sand; red and grey aeolian dune sand
Qc	Kalkkreet en opperviakkalksteen Calcrete and surface limestone
Jd	Doleriet; gang () Dolerite; dyke ()
Jdb	Basaltiese lawa; ondergeskikte fynkorrelrige sandsteen Basaltic lava; subordinate fine-grained sandstone
Rc	Fyn- tot baie fynkorrelrige lig-oranje tot pienk sandsteen Fine- to very fine-grained pale-orange to pink sandstone
Re	Rooi slijksteen en moddersteen, ondergeskikte baie fynkorrelrige sandsteen Red siltstone and mudstone, subordinate very fine-grained sandstone
Rm	Baie grof- tot mediumkorrelrige sandsteen, ondergeskikte moddersteen Very coarse- to medium-grained sandstone, subordinate mudstone
Rt	Fyn- tot mediumkorrelrige, geel en kakiekleurige sandsteen; rooi, pers, blou en groen moddersteen Fine- to medium-grained, yellow and khaki-coloured sandstone; red, purple, blue green mudstone
Pa	Baie fyn- tot grofkorrelrige, gelerige wit en wit sandsteen; blougrys moddersteen en skalie; ondergeskikte konglomeraat Very fine- to coarse-grained, buff white and white sandstone; blue-grey mudstone and shale; subordinate conglomerate
Pt	Grys tot swart skalie, ondergeskikte liggrys, fynkorrelrige sandsteen Grey to black shale, subordinate light-grey, fine-grained sandstone

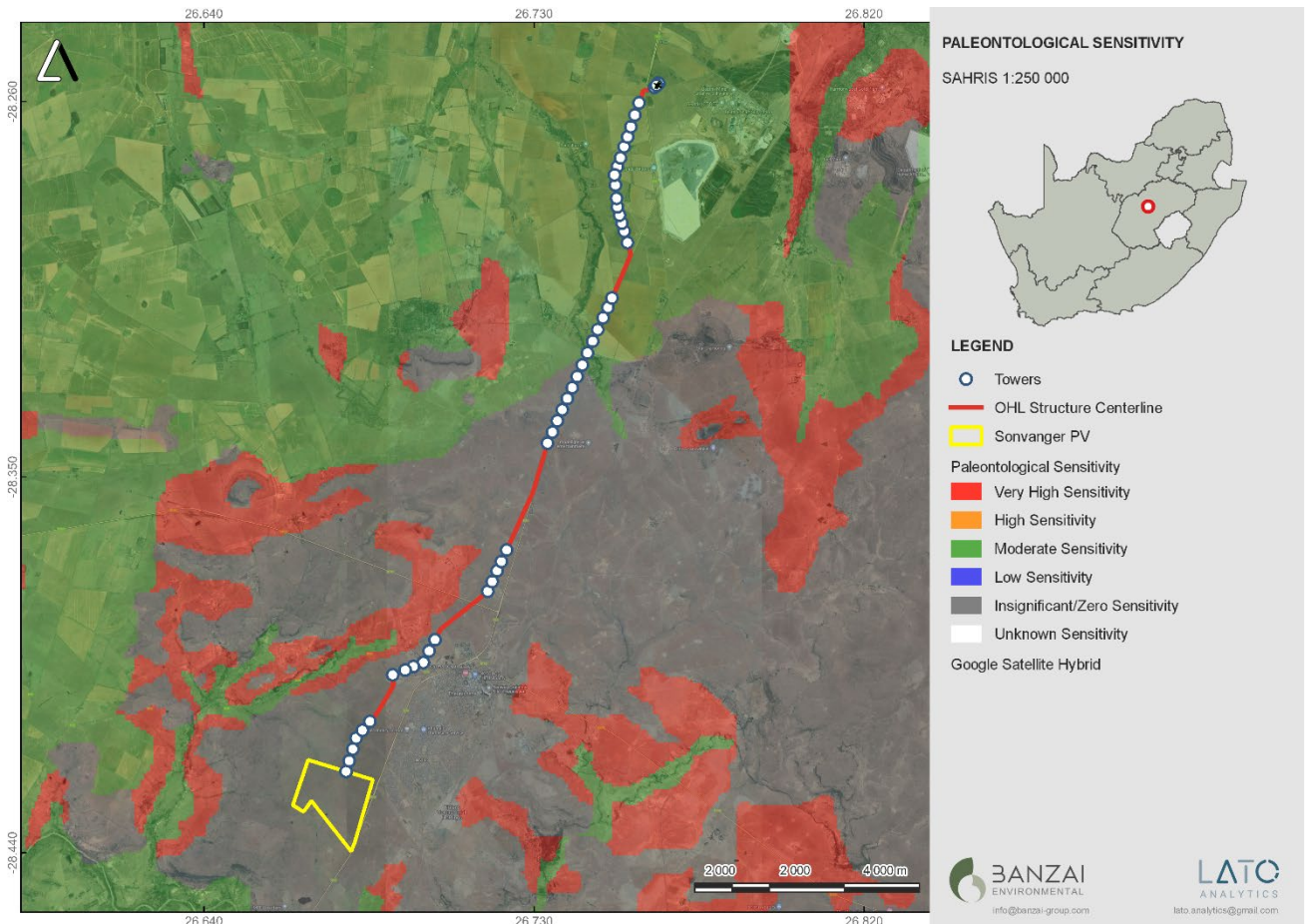


Figure 5: Extract of the 1 in 250 000 SAHRIS PalaeoMap (Council of Geosciences, Pretoria) indicating the proposed Sonvanger grid infrastructure near Theunissen in the Free State.

Although the Site Sensitivity for the Sonvanger grid connection corridor has areas where it is rated as High, no fossils were found during the site investigation.



Table 6: Palaeontological Sensitivity according to the SAHRIS PalaeoMap (Almond et al, 2013; SAHRIS website).

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.

The SAHRIS Palaeosensitivity map (**Figure 5**) indicates that the proposed development is underlain by sediments with a Moderate (green) and Zero (grey) Palaeontological Sensitivity. **However, towers 1, 2, 3, 4 and 7 of the mid portion is underlain by Balfour Formation (updated geology) with a Very High Palaeontological Sensitivity.**

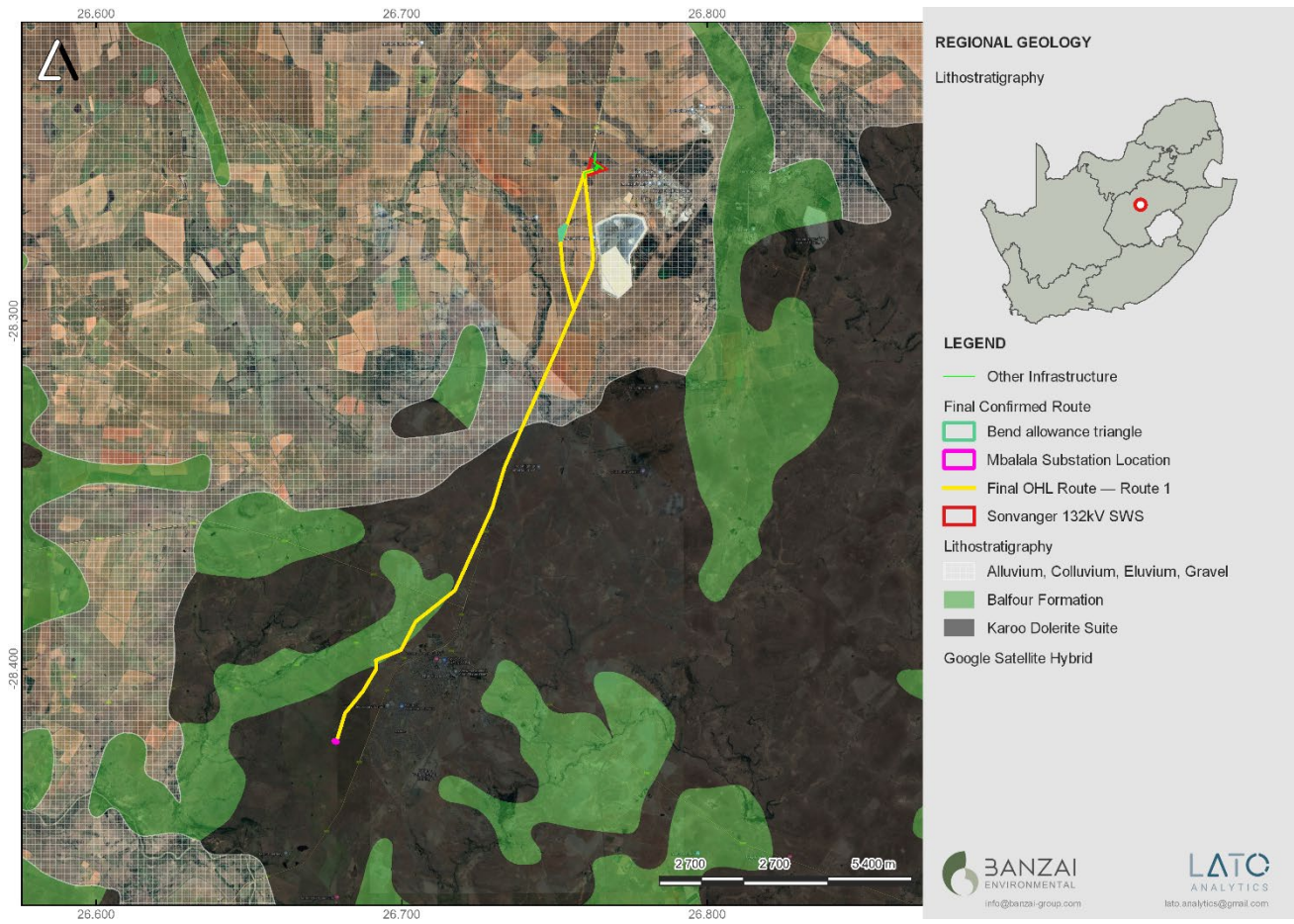


Figure 6: Updated Geology (Council of Geosciences, Pretoria) of the proposed Sonvanger SPP grid connection infrastructure indicates that a portion of the development is underlain by the Balfour Formation of the Adelaide Subgroup (Beaufort Group, Karoo Supergroup).



Age	Gp	West of 24° E		East of 24° E	Free State / KwaZulu-Natal	Vertebrate Assemblage Zones	Vertebrate Subzones				
JURASSIC	STORMBERG			Drakensberg Gp	Drakensberg Gp	Massospondylus					
				Clarens Fm	Clarens Fm						
				upper Elliot Fm	upper Elliot Fm						
				TRIASSIC	Tarkastad Subgp			lower Elliot Fm	lower Elliot Fm	Scalenodontoides	
								Molteno Fm	Molteno Fm		
Burgersdorp Fm	Driekoppen Fm	Cynognathus	Cricodon-Ufudocyclops Trirachodon-Kannemeyeria Langbergia-Gargainia								
Katberg Fm	Verkykerskop Fm	Lystrosaurus declivis									
Palingkloof M.											
PERMIAN	BEAUFORT	Adelaide Subgp	Teekloof Fm		Balfour Fm	Harrismith M.	Daptocephalus	Lystrosaurus maccaigi-Moschorhinus			
					Elandsberg M.	Schoondraai M.					
					Ripplemead M.	Rooinekke M.		Dicynodon-Theriognathus			
					Daggaboersnek M.	Frankfort M.					
					Oudeberg M.		Cistecephalus				
					Middleton Fm		Endothiodon	Tropidostoma-Gorgonops Lycosuchus-Eunotosaurus			
	ECCA							Tapinocephalus	Diictodon-Styracocephalus Eosimops-Glanosuchus		
								Eodicynodon			
						Waterford Fm	Waterford Fm				
						Tierberg/Fort Brown	Fort Brown				

Figure 7: Vertebrate biozonation range chart for the Main Karoo Basin of South Africa.

Solid lines indicate known ranges, dotted lines indicate suspected but not confirmed ranges, single dot represents the stratigraphic position of the taxa that have only been recovered from a single bed.

Wavy lines indicate unconformities. (PLYCSR=Pelycosauria and MAMMFMES+Mammaliaformes. Gp=group, Subgp-Subgroup, Fm=Formation, M=Member)

The geology of the proposed development is indicated by the blue arrow

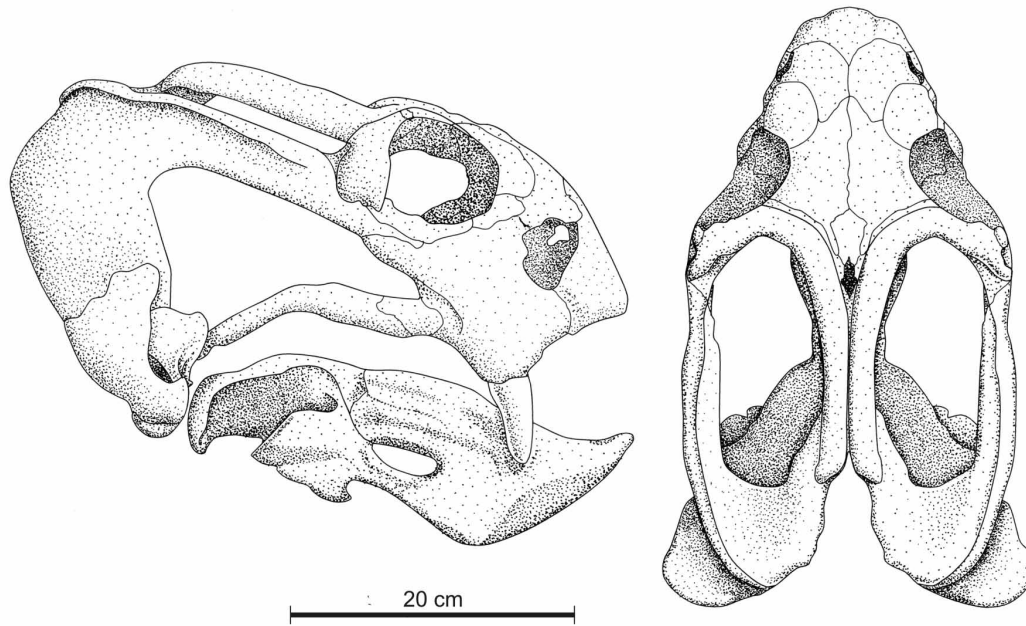


Figure 8: Lateral and dorsal views of skull of the dicynodont *Daptocephalus leoniceps*, the main biozone defining fossil (Image taken from Viglietti, 2020) and dorsal views (Image taken from Viglietti, 2020).

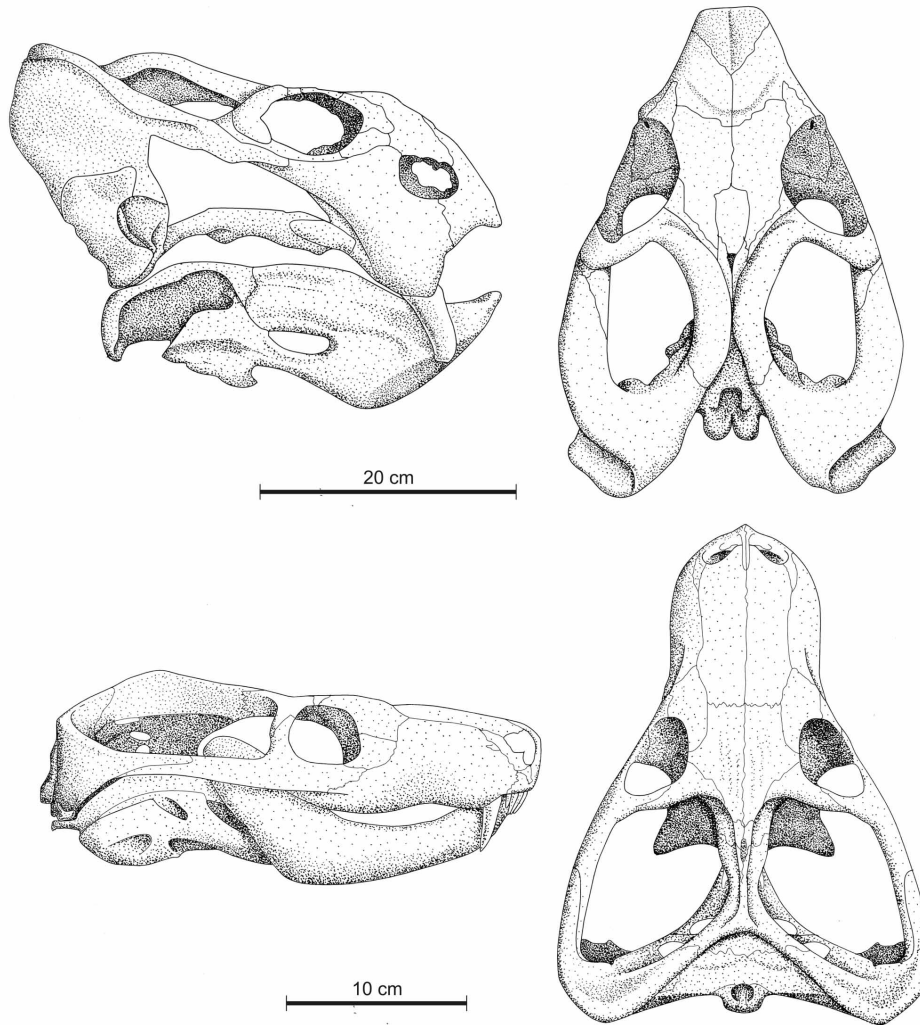


Figure 9: Skulls of the biozone defining fossils of the *Dicynodon-Theriognathus* Subzone in lateral and dorsal views. *Dicynodon lacerticeps* (top), *Theriognathus microps* (bottom) (Image taken from Viglietti, 2020).

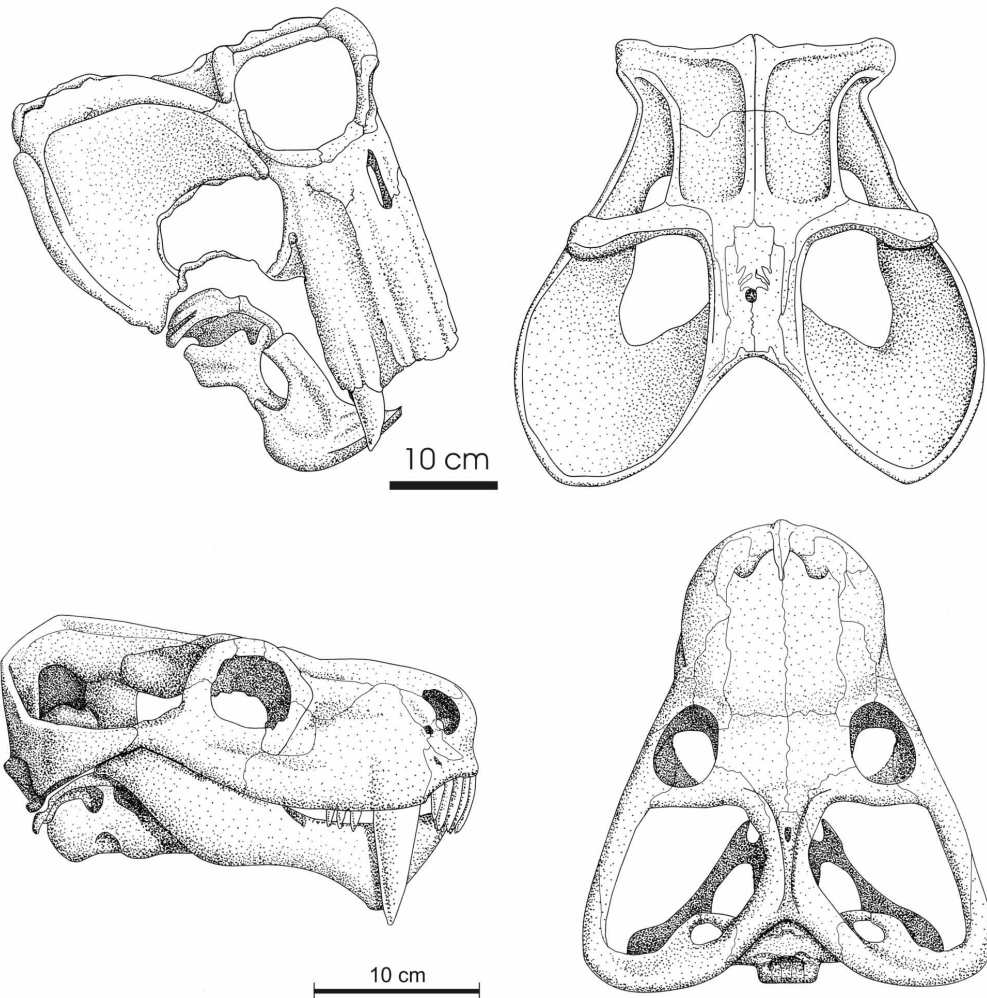


Figure 10: Biozone defining fossils of the *Lystrosaurus maccaigi*- *Moschorhinus* Subzone. The skulls of the *Lystrosaurus maccaigi* (top) and *Moschorhinus kitchingi* (bottom) in lateral (Image taken from Viglietti, 2020).

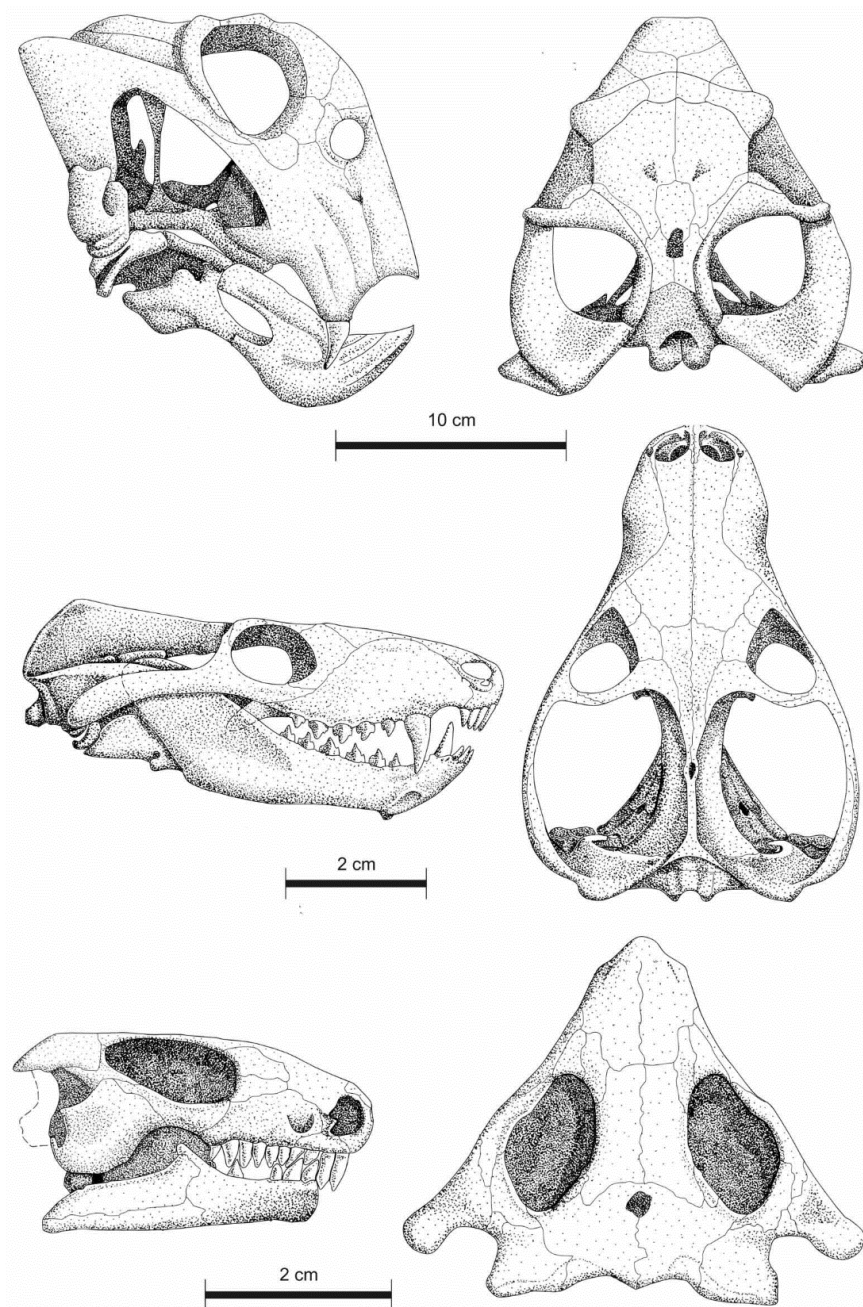


Figure 11: Lateral and dorsal views of the index taxa defining the *Lystrosaurus declivis* Assemblage Zone. (top) *Lystrosaurus declivis*, (centre) *Thrinaxodon liorhinus*, (bottom) *Procolophon trigoniceps* (Image taken from Botha and Smith, 2020).



Figure 12: Reconstruction of *Lystrosaurus* sp.

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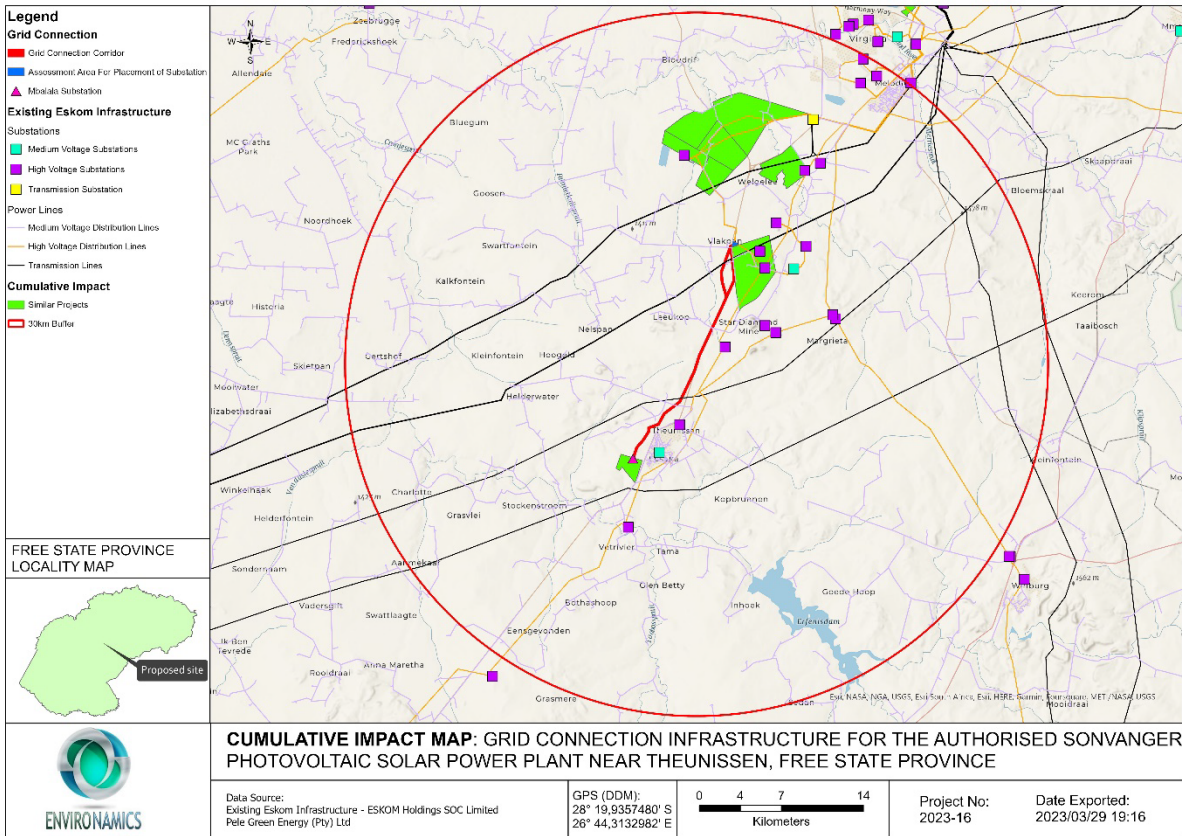


Figure 13: Geographic area of evaluation with utility-scale renewable energy generation sites and power lines.

Solar Facilities to the north and west of the Sonvanger grid infrastructure development will have a Zero to Very High Palaeontological Sensitivity (Figure 5). However, it is important to note that the quality of preservation of these different sites will most probably vary and it is thus difficult to allocate a Cumulative Sensitivity to the projects. If all the mitigation measures are carried out, a conservative estimate of the Cumulative impacts on fossil Heritage will vary between Low and Medium.

The geographic spread of PV solar projects, administrative boundaries and any environmental features (the nature of the landscape) were considered when determining the geographic area of investigation. It was argued that a radius of 30km would generally confine the potential for cumulative effects within this particular environmental landscape. The geographic area includes projects located within the Free State Province. A larger geographic area may be used to analyse cumulative impacts based on the specific temporal or spatial impacts of a resource. For example, the socio-economic cumulative analysis may include a larger area, as the construction workforce may draw from a much wider area. The geographic area of analysis is specified in the discussion of the cumulative impacts for that resource where it differs from the general area of evaluation described above.



Table 7: A summary of related facilities, that may have a cumulative impact, in a 30 km radius of the Sonvanger SPP.

Site	Distance from Study Area	Proposed generating capacity	DEFF Reference	EIA Process	Project status
Farm Palmietkuil 328, Beatrix Mine Shaft 4, Oryx Mine In Virginia, Free State Province	23.3 km	19 MW	12/12/20/2666	BAR	Approved
Portion 52 Of Farm Leeubult, Beatrix Mine Shaft 2 In Virginia, Free State Province	15.8km	14 MW	12/12/20/2667	BAR	Approved
Farm Leeubult 52 Beatrix Mine Shaft 2, Virginia, Free State Province	15.8km	19.9 MW	12/12/20/2668	BAR	Approved
Portion 225 Of Farm Kalkoenkrans, Beatrix Mine Shaft 4, Oryx Mine In Virginia, Free State Province	26.1km	19 MW	12/12/20/2669	BAR	Approved
Co-Generation Plant At Shaft 4 At The Beatrix Gold Mine, Theunissen, Free State Province	25.5km	14.8 MW	14/12/16/3/1/3	BAR	Approved
Co-Generation Facility At The Beatrix Gold Mine Shaft 4, Located Between Theunissen And Virginia, Within Masilonyana Local Municipality, Free State Province.	25.5km	4 MW	14/12/16/3/3/2/328	BAR	Approved
Portion 1 of the Farm Karreebooms Vallei 258	0km	84 MW	14/12/16/3/3/2/672	Scoping and EIA	Approved
Oryx solar energy facility near Virginia Free State Province	26km	75 MW	14/12/16/3/3/2/526	Scoping and EIA	In process



It is unclear whether other projects not related to renewable energy is or has been constructed in this area, and whether other projects are proposed. In general, development activity in the area is focused on agriculture and mining. It is quite possible that future solar farm development may take place within the general area.

7. GEOGRAPHICAL LOCATION OF THE SITE

Theunissen is located approximately 2 km northeast of the proposed development, with the Masilo suburb located directly to the east (**Figure 1-2**).

8. METHODS

The aim of a desktop study is to evaluate the possible risk to palaeontological heritage in the proposed development. This includes all trace fossils as well as all fossils in the proposed footprint. All possible information is consulted to compile a desktop study, and this includes the following: all Palaeontological Impact Assessment reports in the same area; aerial photos and Google Earth images, topographical as well as geological maps. As the Palaeontological Sensitivity of the proposed Sonvanger SPP grid infrastructure corridor is High a site investigation was triggered for the project (see Section 10).

8.1 Assumptions and Limitations

The focal point of geological maps is the geology of the area and the sheet explanations of the Geological Maps were not meant to focus on palaeontological heritage. Many inaccessible regions of South Africa have never been reviewed by palaeontologists and data is generally based on aerial photographs alone. Locality and geological information of museums and universities databases have not been kept up to date or data collected in the past have not always been accurately documented.

Comparable Assemblage Zones in other areas is also used to provide information on the existence of fossils in an area which has not documented in the past. When using similar Assemblage Zones and geological formations for Desktop studies it is generally **assumed** that exposed fossil heritage is present within the footprint. As the Palaeontological Sensitivity on the SAHRIS map indicates that the proposed Lengana SPP development has a High palaeontological Sensitivity a site investigation was triggered.

9. ADDITIONAL INFORMATION CONSULTED

In compiling this report the following sources were consulted:

- Geological map 1:100 000, Geology of the Republic of South Africa (Visser 1984)
- A Google Earth map with polygons of the proposed development was obtained from Environamics.
- Updated geology of the proposed development (Council for Geosciences, Pretoria).

- PIAs in the Theunissen district

10. SITE VISIT

A site-specific field survey of the development footprint was conducted on foot and by motor vehicle on 19 April 2023. No fossiliferous outcrops were identified during the site visit. The development has a low topography mantled by thick grass, and outcrops were not detected. This could be attributed to the extensive dolerite intrusions that metamorphized potentially fossiliferous Beaufort sediments, low relief of the development area as well as poor bedrock exposure and relative unfossiliferous superficial sediments. However, it must be emphasised that the presence of well-preserved fossils is not ruled out.



Figure 14: Study area located on a flat topography with numerous dolerite outcrops.



Figure 15: Flat topography with an absence of Beaufort outcrops.

11. IMPACT ASSESSMENT METHODOLOGY

The environmental assessment aims to identify the various possible environmental impacts that could result from the proposed activity. Different impacts need to be evaluated in terms of their significance and in doing so highlight the most critical issues to be addressed.



Significance is determined through a synthesis of impact characteristics which include context and intensity of an impact. Context refers to the geographical scale i.e., site, local, national or global whereas intensity is defined by the severity of the impact e.g., the magnitude of deviation from background conditions, the size of the area affected, the duration of the impact and the overall probability of occurrence. Significance is calculated as shown in Table 10.

Significance is an indication of the importance of the impact in terms of both physical extent and time scale, and therefore indicates the level of mitigation required. The total number of points scored for each impact indicates the level of significance of the impact.

Impact assessment must take account of the nature, scale and duration of impacts on the environment whether such impacts are positive or negative. Each impact is also assessed according to the project phases:

- planning
- construction
- operation
- decommissioning

Where necessary, the proposal for mitigation or optimisation of an impact should be detailed. A brief discussion of the impact and the rationale behind the assessment of its significance should also be included. The rating system is applied to the potential impacts on the receiving environment and includes an objective evaluation of the mitigation of the impact. In assessing the significance of each impact, the following criteria is used:

Table 8: The rating system

NATURE		
Loss of fossil heritage.		
GEOGRAPHICAL EXTENT		
This is defined as the area over which the impact will be experienced.		
1	Site	The impact will only affect the site.
2	Local/district	Will affect the local area or district.
3	Province/region	Will affect the entire province or region.
4	International and National	Will affect the entire country.
PROBABILITY		
This describes the chance of occurrence of an impact.		
1	Unlikely	The chance of the impact occurring is extremely low (Less than a 25% chance of occurrence).



2	Possible	The impact may occur (Between a 25% to 50% chance of occurrence).
3	Probable	The impact will likely occur (Between a 50% to 75% chance of occurrence).
4	Definite	Impact will certainly occur (Greater than a 75% chance of occurrence).
DURATION		
This describes the duration of the impacts. Duration indicates the lifetime of the impact as a result of the proposed activity.		
1	Short term	The impact will either disappear with mitigation or will be mitigated through natural processes in a span shorter than the construction phase (0 – 1 years), or the impact will last for the period of a relatively short construction period and a limited recovery time after construction, thereafter it will be entirely negated (0 – 2 years).
2	Medium term	The impact will continue or last for some time after the construction phase but will be mitigated by direct human action or by natural processes thereafter (2 – 10 years).
3	Long term	The impact and its effects will continue or last for the entire operational life of the development, but will be mitigated by direct human action or by natural processes thereafter (10 – 30 years).
4	Permanent	The only class of impact that will be non-transitory. Mitigation either by man or natural process will not occur in such a way or such a time span that the impact can be considered indefinite.
INTENSITY/ MAGNITUDE		
Describes the severity of an impact.		
1	Low	Impact affects the quality, use and integrity of the system/component in a way that is barely perceptible.
2	Medium	Impact alters the quality, use and integrity of the system/component but system/component still continues



		to function in a moderately modified way and maintains general integrity (some impact on integrity).
3	High	Impact affects the continued viability of the system/component and the quality, use, integrity and functionality of the system or component is severely impaired and may temporarily cease. High costs of rehabilitation and remediation.
4	Very high	Impact affects the continued viability of the system/component and the quality, use, integrity and functionality of the system or component permanently ceases and is irreversibly impaired. Rehabilitation and remediation often impossible. If possible rehabilitation and remediation often unfeasible due to extremely high costs of rehabilitation and remediation.
REVERSIBILITY		
This describes the degree to which an impact can be successfully reversed upon completion of the proposed activity.		
1	Completely reversible	The impact is reversible with implementation of minor mitigation measures.
2	Partly reversible	The impact is partly reversible but more intense mitigation measures are required.
3	Barely reversible	The impact is unlikely to be reversed even with intense mitigation measures.
4	Irreversible	The impact is irreversible and no mitigation measures exist.
IRREPLACEABLE LOSS OF RESOURCES		
This describes the degree to which resources will be irreplaceably lost as a result of a proposed activity.		
1	No loss of resource	The impact will not result in the loss of any resources.
2	Marginal loss of resource	The impact will result in marginal loss of resources.
3	Significant loss of resources	The impact will result in significant loss of resources.
4	Complete loss of resources	The impact is result in a complete loss of all resources.



CUMULATIVE EFFECT		
<p>This describes the cumulative effect of the impacts. A cumulative impact is an effect which in itself may not be significant but may become significant if added to other existing or potential impacts emanating from other similar or diverse activities as a result of the project activity in question.</p>		
1	Negligible cumulative impact	The impact would result in negligible to no cumulative effects.
2	Low cumulative impact	The impact would result in insignificant cumulative effects.
3	Medium cumulative impact	The impact would result in minor cumulative effects.
4	High cumulative impact	The impact would result in significant cumulative effects
SIGNIFICANCE		
<p>Significance is determined through a synthesis of impact characteristics. Significance is an indication of the importance of the impact in terms of both physical extent and time scale, and therefore indicates the level of mitigation required. The calculation of the significance of an impact uses the following formula: (Extent + probability + reversibility + irreplaceability + duration + cumulative effect) x magnitude/intensity.</p> <p>The summation of the different criteria will produce a non-weighted value. By multiplying this value with the magnitude/intensity, the resultant value acquires a weighted characteristic which can be measured and assigned a significance rating.</p>		
Points	Impact significance rating	Description
6 to 28	Negative low impact	The anticipated impact will have negligible negative effects and will require little to no mitigation.
6 to 28	Positive low impact	The anticipated impact will have minor positive effects.
29 to 50	Negative medium impact	The anticipated impact will have moderate negative effects and will require moderate mitigation measures.
29 to 50	Positive medium impact	The anticipated impact will have moderate positive effects.
51 to 73	Negative high impact	The anticipated impact will have significant effects and will require significant mitigation measures to achieve an acceptable level of impact.
51 to 73	Positive high impact	The anticipated impact will have significant positive effects.



74 to 96	Negative very high impact	The anticipated impact will have highly significant effects and are unlikely to be able to be mitigated adequately. These impacts could be considered "fatal flaws".
74 to 96	Positive very high impact	The anticipated impact will have highly significant positive effects.



Table 9: Summary of Impacts

SPECIALIST STUDY	IMPACT	PRE-MITIGATION RATING	POST MITIGATION RATING	SUMMARY OF MITIGATION MEASURES
Palaeontological Impact Assessment	Disturbance, damage or destruction of legally protected fossil heritage within the development footprint during the construction phase	48	16	<p>The ECO for this project must be informed that the Adelaide Subgroup (Beaufort Group, Karoo Supergroup) has a Very High Palaeontological Sensitivity.</p> <p>If Palaeontological Heritage is uncovered during surface clearing and excavations the Chance find Protocol attached should be implemented immediately. Fossil discoveries ought to be protected and the ECO/site manager must report to South African Heritage Resources Agency (SAHRA) (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za) so that mitigation (recording and collection) can be carried out.</p> <p>Before any fossil material can be collected from the development site the specialist involved would need to apply for a collection permit from SAHRA. Fossil material must be housed in an official collection (museum or university), while all reports and fieldwork should meet the minimum standards for palaeontological impact studies proposed by SAHRA (2012).</p> <p>These recommendations should be incorporated into the Environmental Management Plan for the Lengana Solar Power Plant.</p>



12. FINDINGS AND RECOMMENDATIONS

The majority of the proposed grid infrastructure development is underlain by Jurassic dolerite, while a portion in the northern section is underlain by Quaternary sands. However, a small portion of the 200m grid corridor is underlain by Permian aged sandstone and shale of the Adelaide Subgroup (Beaufort Group, Karoo Supergroup). According to the PalaeoMap of the South African Heritage Resources Information System (SAHRIS) the Palaeontological Sensitivity of Quaternary sands is Moderate, that of the Adelaide Subgroup (Beaufort Group) is Very High while the Palaeontological Sensitivity of Jurassic dolerite is Zero (Almond and Pether, 2009; Almond *et al.*, 2013, Groenewald et al 2014). Updated Geology (Council of Geosciences) refined the geological maps and indicate that the proposed development is underlain by alluvium, colluvium, elluvium and gravel as well as the Karoo Dolerite Suite. This map also indicates that a portion of the Sonvanger grid connection and corridor is underlain by the Balfour Formation (Adelaide Subgroup, Beaufort Group, Karoo Supergroup). The Very High Palaeontological Sensitivity of the Balfour Formation triggered a site investigation of these areas.

A site-specific field survey of the Balfour Formation in the development footprint was conducted on foot and by motor vehicle on 19 April 2023. No fossiliferous outcrop was detected in the proposed development area. This could be attributed to the extensive dolerite intrusions that metamorphized potentially fossiliferous Beaufort sediments, low relief of the development area as well as poor bedrock exposure and relative unfossiliferous superficial sediments. However, it must be emphasised that the presence of well-preserved fossils is not ruled out.

Based on the site investigation as well as desktop research it is concluded that fossil heritage of scientific and conservational interest in the Sonvanger grid connection infrastructure footprint is relatively rare. The apparent rarity of fossil heritage in the proposed development footprint suggests that the impact of the development will be of a Low significance in palaeontological terms. It is therefore considered that the proposed development will not lead to damaging impacts on the palaeontological resources of the area. The construction of the development may thus be permitted in its whole extent, as the development footprint is not considered sensitive in terms of palaeontological resources.

Recommendations:

- The ECO for this project must be informed that the Adelaide Subgroup (Beaufort Group, Karoo Supergroup) has a **Very High Palaeontological Sensitivity**.
- If Palaeontological Heritage is uncovered during surface clearing and excavations, the **Chance find Protocol** attached should be implemented immediately. Fossil discoveries ought to be protected and the ECO/site manager must report to South African Heritage Resources Agency (SAHRA) (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za) so that mitigation (recording and collection) can be carried out.
- Before any fossil material can be collected from the development site, the specialist involved would need to apply for a collection permit from SAHRA. Fossil material must be housed in an official collection (museum or university), while all reports and fieldwork should meet the minimum standards for palaeontological impact studies proposed by SAHRA (2012).



- These recommendations should be incorporated into the Environmental Management Plan for the Sonvanger SPP grid connection infrastructure.

13. CHANCE FINDS PROTOCOL

The following procedure will only be followed if fossils are uncovered during the excavation phase of the development.

Legislation

Cultural Heritage in South Africa (includes all heritage resources) is protected by the **National Heritage Resources Act (Act No 25 of 1999) (NHRA)**. According to Section 3 of the Act, all Heritage resources include “**all objects recovered from the soil or waters of South Africa, including archaeological and palaeontological objects and material, meteorites and rare geological specimens**”.

Palaeontological heritage is unique and non-renewable and is protected by the NHRA and are the property of the State. It is thus the responsibility of the State to manage and conserve fossils on behalf of the citizens of South Africa. Palaeontological resources may not be excavated, broken, moved, or destroyed by any development without prior assessment and without a permit from the relevant heritage resources authority as per section 35 of the NHRA.

A fossil is the naturally preserved remains (or traces thereof) of plants or animals embedded in rock. These organisms lived millions of years ago. Fossils are extremely rare and irreplaceable. By studying fossils, it is possible to determine the environmental conditions that existed in a specific geographical area millions of years ago.

This informational document is intended for workmen and foremen on construction sites. It describes the actions to be taken when mining or construction activities accidentally uncovers fossil material.

It is the responsibility of the Environmental Site Officer (ESO) or site manager of the project to train the workmen and foremen in the procedure to follow when a fossil is accidentally uncovered. In the absence of the ESO, a member of the staff must be appointed to be responsible for the proper implementation of the chance find protocol as not to compromise the conservation of fossil material.

Chance Find Procedure

- If a chance find is made the person responsible for the find must immediately **stop working** and all work that could impact that finding must cease in the immediate vicinity of the find.
- The person who made the find must immediately **report** the find to his/her direct supervisor which in turn must report the find to his/her manager and the ESO or site manager. The ESO or site manager must report the find to the relevant Heritage Agency (South African Heritage Research Agency, SAHRA). (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za). The information to the Heritage Agency must include photographs of the find, from various angles, as well as the GPS co-ordinates.



- A preliminary report must be submitted to the Heritage Agency within **24 hours** of the find and must include the following: 1) date of the find; 2) a description of the discovery and a 3) description of the fossil and its context (depth and position of the fossil), GPS co-ordinates.
- Photographs (the more the better) of the discovery must be of high quality, in focus, accompanied by a scale. It is also important to have photographs of the vertical section (side) where the fossil was found.
- Upon receipt of the preliminary report, the Heritage Agency will inform the ESO (or site manager) whether a rescue excavation or rescue collection by a palaeontologist is necessary.
- The site must be secured to protect it from any further damage. **No attempt** should be made to remove material from their environment. The exposed finds must be stabilized and covered by a plastic sheet or sand bags. The Heritage agency will also be able to advise on the most suitable method of protection of the find.
- If the fossil cannot be stabilized the fossil may be collected with extreme care by the ESO. Fossils finds must be stored in tissue paper and in an appropriate box while due care must be taken to remove all fossil material from the rescue site.
- Once the Heritage Agency has issued the written authorization, the developer may continue with the development on the affected area.

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APPENDIX A CURRICULUM VITAE

Elize Butler

ELIZE BUTLER

PROFESSION: Palaeontologist
YEARS' EXPERIENCE: 30 years in Palaeontology

EDUCATION: B.Sc Botany and Zoology, 1988
University of the Orange Free State

B.Sc (Hons) Zoology, 1991
University of the Orange Free State

Management Course, 1991
University of the Orange Free State

M. Sc. *Cum laude* (Zoology), 2009
University of the Free State

Dissertation title: The postcranial skeleton of the Early Triassic non-mammalian Cynodont *Galesaurus planiceps*: implications for biology and lifestyle

MEMBERSHIP

Palaeontological Society of South Africa (PSSA) 2006-currently

EMPLOYMENT HISTORY

Part-time Laboratory assistant Department of Zoology & Entomology University of the Free State Zoology 1989-1992

Part-time laboratory assistant Department of Virology



	University of the Free State Zoology 1992
Research Assistant	National Museum, Bloemfontein 1993 – 1997
Principal Research Assistant	National Museum, Bloemfontein
and Collection Manager	1998–currently

TECHNICAL REPORTS

Butler, E. 2014. Palaeontological Impact Assessment of the proposed development of private dwellings on portion 5 of farm 304 Matjesfontein Keurboomstrand, Knysna District, Western Cape Province. Bloemfontein.

Butler, E. 2014. Palaeontological Impact Assessment for the proposed upgrade of existing water supply infrastructure at Noupoort, Northern Cape Province. 2014. Bloemfontein.

Butler, E. 2015. Palaeontological impact assessment of the proposed consolidation, re-division, and development of 250 serviced erven in Nieu-Bethesda, Camdeboo local municipality, Eastern Cape. Bloemfontein.

Butler, E. 2015. Palaeontological impact assessment of the proposed mixed land developments at Rooikraal 454, Vrede, Free State. Bloemfontein.

Butler, E. 2015. Palaeontological exemption report of the proposed truck stop development at Palmiet 585, Vrede, Free State. Bloemfontein.

Butler, E. 2015. Palaeontological impact assessment of the proposed Orange Grove 3500 residential development, Buffalo City Metropolitan Municipality East London, Eastern Cape. Bloemfontein.

Butler, E. 2015. Palaeontological Impact Assessment of the proposed Gonubie residential development, Buffalo City Metropolitan Municipality East London, Eastern Cape Province. Bloemfontein.

Butler, E. 2015. Palaeontological Impact Assessment of the proposed Ficksburg raw water pipeline. Bloemfontein.

Butler, E. 2015. Palaeontological Heritage Impact Assessment report on the establishment of the 65 mw Majuba Solar Photovoltaic facility and associated infrastructure on portion 1, 2 and 6 of the farm Witkoppies 81 HS, Mpumalanga Province. Bloemfontein.

Butler, E. 2015. Palaeontological Impact Assessment of the proposed township establishment on the remainder of portion 6 and 7 of the farm Sunnyside 2620, Bloemfontein, Mangaung metropolitan municipality, Free State, Bloemfontein.

Butler, E. 2015. Palaeontological Impact Assessment of the proposed Woodhouse 1 photovoltaic solar energy facilities and associated infrastructure on the farm Woodhouse729, near Vryburg, North West Province. Bloemfontein.

Butler, E. 2015. Palaeontological Impact Assessment of the proposed Woodhouse 2 photovoltaic solar energy facilities and associated infrastructure on the farm Woodhouse 729, near Vryburg, North West Province. Bloemfontein.

Butler, E. 2015. Palaeontological Impact Assessment of the proposed Orkney solar energy farm and associated infrastructure on the remaining extent of Portions 7 and 21 of the farm Wolvehuis 114, near Orkney, North West Province. Bloemfontein.

Butler, E. 2015. Palaeontological Impact Assessment of the proposed Spectra foods broiler houses and abattoir on the farm Maiden Manor 170 and Ashby Manor 171, Lukhanji Municipality, Queenstown, Eastern Cape Province. Bloemfontein.

Butler, E. 2016. Palaeontological Impact Assessment of the proposed construction of the 150 MW Noupoort concentrated solar power facility and associated infrastructure on portion 1 and 4 of the farm Carolus Poort 167 and the remainder of Farm 207, near Noupoort, Northern Cape. Prepared for Savannah Environmental. Bloemfontein.

Butler, E. 2016. Palaeontological Impact Assessment of the proposed Woodhouse 1 Photovoltaic Solar Energy facility and associated infrastructure on the farm Woodhouse 729, near Vryburg, North West Province. Bloemfontein.

Butler, E. 2016. Palaeontological Impact Assessment of the proposed Woodhouse 2 Photovoltaic Solar Energy facility and associated infrastructure on the farm Woodhouse 729, near Vryburg, North West Province. Bloemfontein.

Butler, E. 2016. Proposed 132kV overhead power line and switchyard station for the authorised Solis Power 1 CSP project near Upington, Northern Cape. Bloemfontein.

Butler, E. 2016. Palaeontological Impact Assessment of the proposed Senqu Pedestrian Bridges in Ward 5 of Senqu Local Municipality, Eastern Cape Province. Bloemfontein.

Butler, E. 2016. Recommendation from further Palaeontological Studies: Proposed Construction of the Modderfontein Filling Station on Erf 28 Portion 30, Founders Hill, City of Johannesburg, Gauteng Province. Bloemfontein.

Butler, E. 2016. Recommendation from further Palaeontological Studies: Proposed Construction of the Modikwa Filling Station on a Portion of Portion 2 of Mooihoek 255 Kt, Greater Tubatse Local Municipality, Limpopo Province. Bloemfontein.



- Butler, E. 2016. Recommendation from further Palaeontological Studies: Proposed Construction of the Heidedal filling station on Erf 16603, Heidedal Extension 24, Mangaung Local Municipality, Bloemfontein, Free State Province. Bloemfontein.
- Butler, E. 2016. Recommended Exemption from further Palaeontological studies: Proposed Construction of the Gunstfontein Switching Station, 132kv Overhead Power Line (Single or Double Circuit) and ancillary infrastructure for the Gunstfontein Wind Farm Near Sutherland, Northern Cape Province. Savannah South Africa. Bloemfontein.
- Butler, E. 2016. Palaeontological Impact Assessment of the proposed Galla Hills Quarry on the remainder of the farm Roode Krantz 203, in the Lukhanji Municipality, division of Queenstown, Eastern Cape Province. Bloemfontein.
- Butler, E. 2016. Chris Hani District Municipality Cluster 9 water backlog project phases 3a and 3b: Palaeontology inspection at Tsomo WTW. Bloemfontein.
- Butler, E. 2016. Palaeontological Impact Assessment of the proposed construction of the 150 MW Noupoort concentrated solar power facility and associated infrastructure on portion 1 and 4 of the farm Carolus Poort 167 and the remainder of Farm 207, near Noupoort, Northern Cape. Savannah South Africa. Bloemfontein.
- Butler, E. 2016. Palaeontological Impact Assessment of the proposed upgrading of the main road MR450 (R335) from Motherwell to Addo within the Nelson Mandela Bay Municipality and Sunday's River valley Local Municipality, Eastern Cape Province. Bloemfontein.
- Butler, E. 2016. Palaeontological Impact Assessment construction of the proposed Metals Industrial Cluster and associated infrastructure near Kuruman, Northern Cape Province. Savannah South Africa. Bloemfontein.
- Butler, E. 2016. Palaeontological Impact Assessment for the proposed construction of up to a 132kv power line and associated infrastructure for the proposed Kalkaar Solar Thermal Power Plant near Kimberley, Free State and Northern Cape Provinces. PGS Heritage. Bloemfontein.
- Butler, E. 2016. Palaeontological Impact Assessment of the proposed development of two burrow pits (DR02625 and DR02614) in the Enoch Mgijima Municipality, Chris Hani District, Eastern Cape.
- Butler, E. 2016. Ezibeleni waste Buy-Back Centre (near Queenstown), Enoch Mgijima Local Municipality, Eastern Cape. Bloemfontein.
- Butler, E. 2016. Palaeontological Impact Assessment for the proposed construction of two 5 Mw Solar Photovoltaic Power Plants on Farm Wildebeestkuil 59 and Farm Leeuwbosch 44, Leeudoringstad, North West Province. Bloemfontein.
- Butler, E. 2016. Palaeontological Impact Assessment for the proposed development of four Leeuwerberg Wind farms and basic assessments for the associated grid connection near Loeriesfontein, Northern Cape Province. Bloemfontein.
- Butler, E. 2016. Palaeontological impact assessment for the proposed Aggeneys south prospecting right project, Northern Cape Province. Bloemfontein.
- Butler, E. 2016. Palaeontological impact assessment of the proposed Motuoane Ladysmith Exploration right application, KwaZulu Natal. Bloemfontein.
- Butler, E. 2016. Palaeontological impact assessment for the proposed construction of two 5 MW solar photovoltaic power plants on farm Wildebeestkuil 59 and farm Leeuwbosch 44, Leeudoringstad, North West Province. Bloemfontein.
- Butler, E. 2016: Palaeontological desktop assessment of the establishment of the proposed residential and mixed-use development on the remainder of portion 7 and portion 898 of the farm Knopjeslaagte 385 Ir, located near Centurion within the Tshwane Metropolitan Municipality of Gauteng Province. Bloemfontein.
- Butler, E. 2017. Palaeontological impact assessment for the proposed development of a new cemetery, near Kathu, Gamagara local municipality and John Taolo Gaetsewe district municipality, Northern Cape. Bloemfontein.
- Butler, E. 2017. Palaeontological Impact Assessment of The Proposed Development of The New Open Cast Mining Operations on The Remaining Portions Of 6, 7, 8 And 10 Of the Farm Kwaggafontein 8 In the Carolina Magisterial District, Mpumalanga Province. Bloemfontein.
- Butler, E. 2017. Palaeontological Desktop Assessment for the Proposed Development of a Wastewater Treatment Works at Lanseria, Gauteng Province. Bloemfontein.
- Butler, E. 2017. Palaeontological Scoping Report for the Proposed Construction of a Warehouse and Associated Infrastructure at Perseverance in Port Elizabeth, Eastern Cape Province.
- Butler, E. 2017. Palaeontological Desktop Assessment for the Proposed Establishment of a Diesel Farm and a Haul Road for the Tshipi Borwa mine Near Hotazel, In the John Taolo Gaetsewe District Municipality in the Northern Cape Province. Bloemfontein.
- Butler, E. 2017. Palaeontological Desktop Assessment for the Proposed Changes to Operations at the UMK Mine near Hotazel, In the John Taolo Gaetsewe District Municipality in the Northern Cape Province. Bloemfontein.
- Butler, E. 2017. Palaeontological Impact Assessment for the Development of the Proposed Ventersburg Project-An Underground Mining Operation near Ventersburg and Henneman, Free State Province. Bloemfontein.
- Butler, E. 2017. Palaeontological desktop assessment of the proposed development of a 3000 MW combined cycle gas turbine (CCGT) in Richards Bay, Kwazulu-Natal. Bloemfontein.
- Butler, E. 2017. Palaeontological Impact Assessment for the Development of the Proposed Revalidation of the lapsed General Plans for Elliotdale, Mbhashe Local Municipality. Bloemfontein.



- Butler, E. 2017. Palaeontological assessment of the proposed development of a 3000 MW Combined Cycle Gas Turbine (CCGT) in Richards Bay, Kwazulu-Natal. Bloemfontein.
- Butler, E. 2017. Palaeontological Impact Assessment of the proposed development of the new open cast mining operations on the remaining portions of 6, 7, 8 and 10 of the farm Kwaggafontein 8 10 in the Albert Luthuli Local Municipality, Gert Sibande District Municipality, Mpumalanga Province. Bloemfontein.
- Butler, E. 2017. Palaeontological Impact Assessment of the proposed mining of the farm Zandvoort 10 in the Albert Luthuli Local Municipality, Gert Sibande District Municipality, Mpumalanga Province. Bloemfontein.
- Butler, E. 2017. Palaeontological Desktop Assessment for the proposed Lanseria outfall sewer pipeline in Johannesburg, Gauteng Province. Bloemfontein.
- Butler, E. 2017. Palaeontological Desktop Assessment of the proposed development of open pit mining at Pit 36W (New Pit) and 62E (Dishaba) Amandelbult Mine Complex, Thabazimbi, Limpopo Province. Bloemfontein.
- Butler, E. 2017. Palaeontological impact assessment of the proposed development of the sport precinct and associated infrastructure at Merrifield Preparatory school and college, Amathole Municipality, East London. PGS Heritage. Bloemfontein.
- Butler, E. 2017. Palaeontological impact assessment of the proposed construction of the Lehae training and fire station, Lenasia, Gauteng Province. Bloemfontein.
- Butler, E. 2017. Palaeontological Desktop Assessment of the proposed development of the new open cast mining operations of the Impunzi mine in the Mpumalanga Province. Bloemfontein.
- Butler, E. 2017. Palaeontological Desktop Assessment of the construction of the proposed Viljoenskroon Munic 132 KV line, Vierfontein substation and related projects. Bloemfontein.
- Butler, E. 2017. Palaeontological Desktop Assessment of the proposed rehabilitation of 5 ownerless asbestos mines. Bloemfontein.
- Butler, E. 2017. Palaeontological Desktop Assessment of the proposed development of the Lephale coal and power project, Lephale, Limpopo Province, Republic of South Africa. Bloemfontein.
- Butler, E. 2017. Palaeontological Impact Assessment of the proposed construction of a 132KV powerline from the Tweespruit distribution substation (in the Mantsopa local municipality) to the Driedorp rural substation (within the Naledi local municipality), Free State province. Bloemfontein.
- Butler, E. 2017. Palaeontological Desktop Assessment of the proposed development of the new coal-fired power plant and associated infrastructure near Makhado, Limpopo Province. Bloemfontein.
- Butler, E. 2017. Palaeontological Impact Assessment of the proposed construction of a Photovoltaic Solar Power station near Collett substation, Middelburg, Eastern Cape. Bloemfontein.
- Butler, E. 2017. Palaeontological Impact Assessment for the proposed township establishment of 2000 residential sites with supporting amenities on a portion of farm 826 in Botshabelo West, Mangaung Metro, Free State Province. Bloemfontein.
- Butler, E. 2017. Palaeontological Desktop Assessment for the proposed prospecting right project without bulk sampling, in the Koa Valley, Northern Cape Province. Bloemfontein.
- Butler, E. 2017. Palaeontological Desktop Assessment for the proposed Aroams prospecting right project, without bulk sampling, near Aggeneys, Northern Cape Province. Bloemfontein.
- Butler, E. 2017. Palaeontological Impact Assessment of the proposed Belvoir aggregate quarry II on portion 7 of the farm Maidenhead 169, Enoch Mgijima Municipality, division of Queenstown, Eastern Cape. Bloemfontein.
- Butler, E. 2017. PIA site visit and report of the proposed Galla Hills Quarry on the remainder of the farm Roode Krantz 203, in the Lukhanji Municipality, division of Queenstown, Eastern Cape Province. Bloemfontein.
- Butler, E. 2017. Palaeontological Impact Assessment of the proposed construction of Tina Falls Hydropower and associated power lines near Cumbu, Mthlontlo Local Municipality, Eastern Cape. Bloemfontein.
- Butler, E. 2017. Palaeontological Desktop Assessment of the proposed construction of the Mangaung Gariep Water Augmentation Project. Bloemfontein.
- Butler, E. 2017. Palaeontological Impact Assessment of the proposed Belvoir aggregate quarry II on portion 7 of the farm Maidenhead 169, Enoch Mgijima Municipality, division of Queenstown, Eastern Cape. Bloemfontein.
- Butler, E. 2017. Palaeontological Impact Assessment of the proposed construction of the Melkspruit-Rouxville 132KV Power line. Bloemfontein.
- Butler, E. 2017. Palaeontological Desktop Assessment of the proposed development of a railway siding on a Portion of portion 41 of the farm Rustfontein 109 is, Govan Mbeki local municipality, Gert Sibande district municipality, Mpumalanga Province. Bloemfontein.
- Butler, E. 2017. Palaeontological Impact Assessment of the proposed consolidation of the proposed Ilima Colliery in the Albert Luthuli local municipality, Gert Sibande District Municipality, Mpumalanga Province. Bloemfontein.
- Butler, E. 2017. Palaeontological Desktop Assessment of the proposed extension of the Kareerand Tailings Storage Facility, associated borrow pits as well as a storm water drainage channel in the Vaal River near Stilfontein, North West Province. Bloemfontein.



- Butler, E. 2017. Palaeontological Desktop Assessment of the proposed construction of a filling station and associated facilities on the Erf 6279, district municipality of John Taolo Gaetsewe District, Ga-Segonyana Local Municipality Northern Cape. Bloemfontein.
- Butler, E. 2017. Palaeontological Desktop Assessment of the proposed of the Lephale Coal and Power Project, Lephale, Limpopo Province, Republic of South Africa. Bloemfontein.
- Butler, E. 2017. Palaeontological Desktop Assessment of the proposed Overvaal Trust PV Facility, Buffelspoort, North West Province. Bloemfontein.
- Butler, E. 2017. Palaeontological Impact Assessment of the proposed development of the H₂ Energy Power Station and associated infrastructure on Portions 21; 22 And 23 of the farm Hartebeestspruit in the Thembisile Hani Local Municipality, Nkangala District near Kwamhlanga, Mpumalanga Province. Bloemfontein.
- Butler, E. 2017. Palaeontological Impact Assessment of the proposed upgrade of the Sandriver Canal and Klippan Pump station in Welkom, Free State Province. Bloemfontein.
- Butler, E. 2017. Palaeontological Impact Assessment of the proposed upgrade of the 132kv and 11kv power line into a dual circuit above ground power line feeding into the Urania substation in Welkom, Free State Province. Bloemfontein.
- Butler, E. 2017. Palaeontological Desktop Assessment of the proposed Swaziland-Mozambique border patrol road and Mozambique barrier structure. Bloemfontein.
- Butler, E. 2017. Palaeontological Impact Assessment of the proposed diamonds alluvial & diamonds general prospecting right application near Christiana on the remaining extent of portion 1 of the farm Kaffraria 314, registration division HO, North West Province. Bloemfontein.
- Butler, E. 2017. Palaeontological Desktop Assessment for the proposed development of Wastewater Treatment Works on Hartebeesfontein, near Panbult, Mpumalanga. Bloemfontein.
- Butler, E. 2017. Palaeontological Desktop Assessment for the proposed development of Wastewater Treatment Works on Rustplaas near Piet Retief, Mpumalanga. Bloemfontein.
- Butler, E. 2018. Palaeontological Impact Assessment for the Proposed Landfill Site in Luckhoff, Letsemeng Local Municipality, Xhariep District, Free State. Bloemfontein.
- Butler, E. 2018. Palaeontological Impact Assessment of the proposed development of the new Mutsho coal-fired power plant and associated infrastructure near Makhado, Limpopo Province. Bloemfontein.
- Butler, E. 2018. Palaeontological Impact Assessment of the authorisation and amendment processes for Manangu mine near Delmas, Victor Khanye local municipality, Mpumalanga. Bloemfontein.
- Butler, E. 2018. Palaeontological Desktop Assessment for the proposed Mashishing township establishment in Mashishing (Lydenburg), Mpumalanga Province. Bloemfontein.
- Butler, E. 2018. Palaeontological Desktop Assessment for the Proposed Mlonzi Estate Development near Lusikisiki, Ngquza Hill Local Municipality, Eastern Cape. Bloemfontein.
- Butler, E. 2018. Palaeontological Phase 1 Assessment of the proposed Swaziland-Mozambique border patrol road and Mozambique barrier structure. Bloemfontein.
- Butler, E. 2018. Palaeontological Desktop Assessment for the proposed electricity expansion project and Sekgame Switching Station at the Sishen Mine, Northern Cape Province. Bloemfontein.
- Butler, E. 2018. Palaeontological field assessment of the proposed construction of the Zonnebloem Switching Station (132/22kV) and two loop-in loop-out power lines (132kV) in the Mpumalanga Province. Bloemfontein.
- Butler, E. 2018. Palaeontological Field Assessment for the proposed re-alignment and de-commissioning of the Firham-Platrand 88kv Powerline, near Standerton, Lekwa Local Municipality, Mpumalanga province. Bloemfontein.
- Butler, E. 2018. Palaeontological Desktop Assessment of the proposed Villa Rosa development In the Buffalo City Metropolitan Municipality, East London. Bloemfontein.
- Butler, E. 2018. Palaeontological field Assessment of the proposed Villa Rosa development In the Buffalo City Metropolitan Municipality, East London. Bloemfontein.
- Butler, E. 2018. Palaeontological desktop assessment of the proposed Mookodi – Mahikeng 400kV line, North West Province. Bloemfontein.
- Butler, E. 2018. Palaeontological Desktop Assessment for the proposed Thornhill Housing Project, Ndlambe Municipality, Port Alfred, Eastern Cape Province. Bloemfontein.
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