



CES: PROPOSED STURDEE ENERGY PPC DWAALBOOM SOLAR PROJECT ON PORTIONS OF THE FARMS SCHOONGEZICHT 238KP AND JAKHALSKRAAL 239KP, THABAZIMBI LOCAL MUNICIPALITY, LIMPOPO PROVINCE

Integrated Heritage Impact Assessment Report

Submitted subject to Section 38(3) and Section 38(8) of the NHRA

A 3D rendering of a globe with water splashing over it, set against a white background. The globe is partially obscured by a green circle and a grey infinity symbol.

**Innovation in
Sustainability**

Prepared for: **CES**

Prepared by: **Exigo Sustainability**

INTEGRATED HERITAGE IMPACT ASSESSMENT (HIA) ON PORTIONS OF THE FARMS SCHOONGEZICHT 238KP AND JAKHALSKRAAL 239KP FOR THE PROPOSED STURDEE ENERGY PPC DWAALBOOM SOLAR PROJECT, THABAZIMBI LOCAL MUNICIPALITY, LIMPOPO PROVINCE

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DOCUMENT DISTRIBUTION LIST

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DOCUMENT HISTORY

Date	Version	Status
10 March 2021	1.0	Draft
25 March 2021	2.0	Final Draft
4 July 2021	3.0	Final

DECLARATION

I, Nelius Le Roux Kruger, declare that –

- I act as the independent specialist;
- I am conducting any work and activity relating to the proposed Sturdee Energy PPC Dwaalboom Solar Project in an objective manner, even if this results in views and findings that are not favourable to the client;
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have the required expertise in conducting the specialist report and I will comply with legislation, including the relevant Heritage Legislation (National Heritage Resources Act no. 25 of 1999, Human Tissue Act 65 of 1983 as amended, Removal of Graves and Dead Bodies Ordinance no. 7 of 1925, Excavations Ordinance no. 12 of 1980), the Minimum Standards: Archaeological and Palaeontological Components of Impact Assessment (SAHRA, AMAFA and the CRM section of ASAPA), regulations and any guidelines that have relevance to the proposed activity;
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- 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;
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Signature of specialist
Company: Exigo Sustainability
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EXECUTIVE SUMMARY

This report details the results of a Heritage Impact Assessment (HIA) and findings from a Palaeontological Desktop Assessment in support of an Environmental Impact Assessment (EIA) process for the proposed Sturdee Energy PPC Dwaalboom Solar Project on Portions of the farms Schoongezicht 238KP and Jakhalskraal 239KP in the Thabazimbi Local Municipality of the Limpopo Province. The proposed project entails the establishment of a PV solar facility across an area of approximately **20ha** at the PPC Dwaalboom Operations and a 11kV cable connecting to the Dwaalboom plant which is situated approximately 60km southwest of the town of Thabazimbi. Two site alternatives were initially identified for the project and **Site Alternative 1** was established to be the preferred development footprint. The report includes an Archaeological Impact Assessment (AIA) component and a Paleontological Desktop Assessment (PDA). These studies provide background information on the area’s archaeology, paleontology and sense of landscape and place in terms of its representation in Southern Africa as well as project methodologies and results as well as heritage legislation and conservation policies. A copy of the report will be supplied to the South African Heritage Resources Agency (SAHRA) and recommendations contained in this document will be reviewed.

Project Title	Sturdee Energy PPC Dwaalboom Solar Project
Project Location	Site (Preferred): S24.806268° E26.841379°
1:50 000 Map Sheet	2426DD
Farm Portion / Parcel	Portions of the farms Schoongezicht 238KP and Jakhalskraal 239KP
Magisterial District / Municipal Area	Thabazimbi Local Municipality
Province	Limpopo Province

The history of the eastern Limpopo Province and the Waterberg is reflected in an immensely rich archaeological landscape. The interaction between the climate, geology, topography, and the fauna and flora in the Waterberg Biosphere over millions of years has established a milieu in which prehistoric and historic communities thrived. Stone Age habitation occurs in places, mostly in open air locales or in sediments alongside rivers or pans. Bantu-speaking groups moved into this area during the last millennia and these groups, who practiced herding, agriculture, metal working and trading, found a suitable living environment during the Earlier, Middle and Later Iron Age. It was here that their chiefdoms flourished. European farmers, settling in the area since the middle of the 19th century, divided up the landscape into a number of farms. Historical trade routes were well established before the period of Colonial expansion and these routes mainly existed as a direct consequence of mining. During the nineteenth century the Highveld was extensively settled by both Bantu and European groups that migrated into this area and the landscape saw intensive conflicts and war events towards the end of the 19th century. In recent years an urban element developed, expanding at a rapid rate, largely as a result of farming development in the region.

In terms of palaeontology, it was established that part of the development footprint is situated on the Malmani Subgroup with a high palaeontological sensitivity. Threats to the National Heritage are earth moving equipment/machinery (for example haul trucks, front end loaders, excavators, graders, dozers) during construction, the sealing-in or destruction of the fossils by development, vehicle traffic, and human disturbance. The Nature of the impact is the destruction of Fossil Heritage. Loss of fossil heritage will have a negative impact.

The probability of the impact occurring is improbable. The expected duration of the impact is assessed as potentially permanent. Only the site will be affected. In the absence of mitigation procedures (should fossil material be present within the affected area) the damage or destruction of any palaeontological materials will be permanent. The loss of resources occurs but natural cultural and social processes continue, albeit in a modified manner. With Mitigation the impact will be low and the cumulative impact is low. Impacts on palaeontological heritage during the construction and preconstruction phase could potentially occur but are regarded as having a low/minor possibility. The significance of the impact occurring will be low. The following recommendations are made in terms of palaeontology:

- Special care must be taken during the digging, drilling, blasting and excavating of foundations, trenches, channels and footings and removal of overburden. An appropriate Protocol and Management plan is attached for the Environmental Control Officer in the PDA.
- Mitigation may be needed if fossils (stromatolites) are found.
- The Environmental Control Officer must familiarise him- or herself with the formations present and its fossils.
- The development may go ahead, but the ECO must survey for fossils before and or after clearing, blasting, drilling or excavating.
- The EMPr already covers the conservation of heritage and palaeontological material that may be exposed during construction activities. For a chance find, the protocol is to immediately cease all construction activities, construct a 30 m no-go barrier, and contact SAHRA for further investigation.
- Care must be taken during the dolomite risk assessment as stromatolites may be present (according SANS 1936-1 (2012)) not to destroy any stromatolites.

In terms of archaeology, it has been noted that the farm Schoongezicht and Jakhalskraal subject to this assessment was portioned towards the end of the 19th century and no particular reference to archaeological sites or features of heritage potential were recorded during an examination of literature thematically or geographically related to the properties. An examination of historical aerial imagery and archive maps indicate that the larger landscape had been utilized for intensive agriculture during the last century and portions of Schoongezicht and Jakhalskraal, and the project area have been altered and transformed in the last century. This inference was confirmed during an archaeological site assessment which was constrained by dense surface vegetation. During the survey, **no heritage receptors were noted** and it might be assumed that development at the preferred site will result in a minimal (if any) impact on heritage resources. This inference is made subject to further on-site observations required during pre-construction vegetation clearing and earth moving activities. The following recommendations are made based on general observations in the proposed Sturdee Energy PPC Dwaalboom Solar Project in terms of heritage resources management.

- The site survey for the Sturdee Energy PPC Dwaalboom Solar Project AIA proved to be constrained by dense and often impenetrable vegetation which restricted free movement and obstructed surface visibility. Findings from the desktop assessment, indicating a sparse human settlement pattern and significant agriculture development during the last century, suggest a low heritage potential for the project area. However, the possibility that undetected heritage receptors might be present in the project footprint should not be excluded and the close and frequent monitoring of the initial stages of the project (vegetation clearing, earth moving and excavations) by an informed Environmental Control Officer (ECO) is recommended. Should any subsurface palaeontological, archaeological or historical material, or burials be exposed during construction

activities, all activities should be suspended and the archaeological specialist should be notified immediately.

- It should be stated that it is likely that further undetected archaeological remains might occur elsewhere in the project landscape along water sources and drainage lines, fountains and pans would often have attracted human activity in the past. Also, since Stone Age material seems to originate from below present soil surfaces in eroded areas, the larger landscape should be regarded as potentially sensitive in terms of possible subsurface deposits. Burials and historically significant structures dating to the Colonial Period occur on farms in the area and these resources should be avoided during all phases of construction and development, including the operational phases of the development.

This report details the methodology, limitations and recommendations relevant to these heritage areas, as well as areas of proposed development. It should be noted that recommendations and possible mitigation measures are valid for the duration of the development process, and mitigation measures might have to be implemented on additional features of heritage importance not detected during this Phase 1 assessment (e.g. uncovered during the construction process).

NOTATIONS AND TERMS/TERMINOLOGY

Absolute dating: Absolute dating provides specific dates or range of dates expressed in years.

Archaeological record: The archaeological record minimally includes all the material remains documented by archaeologists. More comprehensive definitions also include the record of culture history and everything written about the past by archaeologists.

Artefact: Entities whose characteristics result or partially result from human activity. The shape and other characteristics of the artefact are not altered by removal of the surroundings in which they are discovered. In the Southern African context examples of artefacts include potsherds, iron objects, stone tools, beads and hut remains.

Assemblage: A group of artefacts recurring together at a particular time and place, and representing the sum of human activities.

Context: An artefact's context usually consists of its immediate *matrix*, its *provenience* and its *association* with other artefacts. When found in *primary context*, the original artefact or structure was undisturbed by natural or human factors until excavation and if in *secondary context*, disturbance or displacement by later ecological action or human activities occurred.

Cultural Heritage Resource: The broad generic term *Cultural Heritage Resources* refers to any physical and spiritual property associated with past and present human use or occupation of the environment, cultural activities and history. The term includes sites, structures, places, natural features and material of palaeontological, archaeological, historical, aesthetic, scientific, architectural, religious, symbolic or traditional importance to specific individuals or groups, traditional systems of cultural practice, belief or social interaction.

Cultural landscape: A cultural landscape refers to a distinctive geographic area with cultural significance.

Cultural Resource Management (CRM): A system of measures for safeguarding the archaeological heritage of a given area, generally applied within the framework of legislation designed to safeguard the past.

Feature: Non-portable artefacts, in other words artefacts that cannot be removed from their surroundings without destroying or altering their original form. Hearths, roads, and storage pits are examples of archaeological features

Impact: A description of the effect of an aspect of the development on a specified component of the biophysical, social or economic environment within a defined time and space.

Lithic: Stone tools or waste from stone tool manufacturing found on archaeological sites.

Matrix: The material in which an artefact is situated (sediments such as sand, ashy soil, mud, water, etcetera). The matrix may be of natural origin or human-made.

Midden: Refuse that accumulates in a concentrated heap.

Microlith: A small stone tool, typically knapped of flint or chert, usually about three centimetres long or less.

Monolith: A geological feature such as a large rock, consisting of a single massive stone or rock, or a single piece of rock placed as, or within, a monument or site.

Phase 1 CRM Assessment: An Impact Assessment which identifies archaeological and heritage sites, assesses their significance and comments on the impact of a given development on the sites. Recommendations for site mitigation or conservation are also made during this phase.

Phase 2 CRM Study: In-depth studies which could include major archaeological excavations, detailed site surveys and mapping / plans of sites, including historical / architectural structures and features. Alternatively, the sampling of sites by collecting material, small test pit excavations or auger sampling is required. Mitigation / Rescue involves planning the protection of significant sites or sampling through excavation or collection (in terms of a permit) at sites that may be lost as a result of a given development.

Phase 3 CRM Measure: A Heritage Site Management Plan (for heritage conservation), is required in rare cases where the site is so important that development will not be allowed and sometimes developers are encouraged to enhance the value of the sites retained on their properties with appropriate interpretive material or displays.

Provenience: Provenience is the three-dimensional (horizontal and vertical) position in which artefacts are found. Fundamental to ascertaining the provenience of an artefact is *association*, the co-occurrence of an artefact with other archaeological remains; and *superposition*, the principle whereby artefacts in lower levels of a matrix were deposited before the artefacts found in the layers above them, and are therefore older.

Random Sampling: A probabilistic sampling strategy whereby randomly selected sample blocks in an area are surveyed. These are fixed by drawing coordinates of the sample blocks from a table of random numbers.

Scoping Assessment: The process of determining the spatial and temporal boundaries (i.e. extent) and key issues to be addressed in an impact assessment. The main purpose is to focus the impact assessment on a manageable number of important questions on which decision making is expected to focus and to ensure that only key issues and reasonable alternatives are examined. The outcome of the scoping process is a Scoping Report that includes issues raised during the scoping process, appropriate responses and, where required, terms of reference for specialist involvement.

Site (Archaeological): A distinct spatial clustering of artefacts, features, structures, and organic and environmental remains, as the residue of human activity. These include surface sites, caves and rock shelters, larger open-air sites, sealed sites (deposits) and river deposits. Common functions of archaeological sites include living or habitation sites, kill sites, ceremonial sites, burial sites, trading, quarry, and art sites,

Stratigraphy: This principle examines and describes the observable layers of sediments and the arrangement of strata in deposits

Systematic Sampling: A probabilistic sampling strategy whereby a grid of sample blocks is set up over the survey area and each of these blocks is equally spaced and searched.

Trigger: A particular characteristic of either the receiving environment or the proposed project which indicates that there is likely to be an *issue* and/or potentially significant *impact* associated with that proposed development that may require specialist input. Legal requirements of existing and future legislation may also trigger the need for specialist involvement.

LIST OF ABBREVIATIONS

Abbreviation	Description
ASAPA	Association for South African Professional Archaeologists
AIA	Archaeological Impact Assessment
BP	Before Present
BCE	Before Common Era
BGG	Burial Grounds and Graves
CRM	Culture Resources Management
EIA	Early Iron Age (also Early Farmer Period)
EIA	Environmental Impact Assessment
EFP	Early Farmer Period (also Early Iron Age)
ESA	Earlier Stone Age
GIS	Geographic Information Systems
HIA	Heritage Impact Assessment
ICOMOS	International Council on Monuments and Sites
K2/Map	K2/Mapungubwe Period
LFP	Later Farmer Period (also Later Iron Age)
LIA	Later Iron Age (also Later Farmer Period)
LSA	Later Stone Age
MIA	Middle Iron Age (also Early later Farmer Period)
MRA	Mining Right Area
MSA	Middle Stone Age
NHRA	National Heritage Resources Act No.25 of 1999, Section 35
PFS	Pre-Feasibility Study
PHRA	Provincial Heritage Resources Authorities
SAFA	Society for Africanist Archaeologists
SAHRA	South African Heritage Resources Association
YCE	Years before Common Era (Present)

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1 BACKGROUND

1.1 Scope and Motivation

Exigo Sustainability (Pty) Ltd (Exigo) was commissioned by CES to conduct a Heritage Impact Assessment (HIA) study in support of an Environmental Impact Assessment (EIA) process for the proposed Sturdee Energy PPC Dwaalboom Solar Project in the Limpopo Province. The rationale of this HIA is to determine the presence of heritage resources such as archaeological and historical sites and features, graves and places of religious and cultural significance as well as palaeontological features in previously unstudied areas; to consider the impact of the proposed project on such heritage resources, and to submit appropriate recommendations with regard to the cultural resources management measures that may be required at affected sites / features.

1.2 Project Direction

Exigo's expertise ensures that all projects be conducted to the highest international ethical and professional standards. As archaeological specialist for Exigo Sustainability, Mr Neels Kruger acted as field director for the project; responsible for the assimilation of all information, the compilation of the final consolidated AIA report and recommendations in terms of heritage resources on the demarcated project areas. Mr Kruger is an accredited archaeologist and Culture Resources Management (CRM) practitioner with the Association of South African Professional Archaeologists (ASAPA), a member of the Society for Africanist Archaeologists (SAFA) and the Pan African Archaeological Association (PAA) as well as a Master's Degree candidate in archaeology at the University of Pretoria.

1.3 Project Brief

CES was appointed by Sturdee Energy to undertake the EIA for the proposed solar PV project at the PPC Dwaalboom Operation on Portions of the farms Schoongezicht 238KP and Jakhalskraal 239KP, Thabazimbi Local Municipality in the Limpopo Province (hereafter referred to as the "Sturdee Energy PPC Dwaalboom Solar Project"). Two site alternatives were initially identified for the project and **Site Alternative 1** was established to be the preferred development footprint. For the integrated HIA, an AIA and a PDA¹ (refer to Addendum 4) were commissioned.

The location of the solar PV plant has been optimized within the allocated land parcels provided by the Client. A Medium Voltage (MV) overhead line (OHL) has been proposed to interconnect the PV plant to the PPC main distribution substation on each site. The following infrastructure components are proposed:

- **Mounting Structures.**

The structures chosen are oriented in a North-South axis along a single-axis horizontal axis system, which rotates the panels to orient them, at the sunrise, to the east and, at the sunset, to the West. The reason for this selection was done to enhance the total yield over the life-span of the PV system. On average this system will yield +-15% more energy (kWhrs) at the point of connection every year for the life of the plant, as compared to a fixed-tilt system at an angle of 25 degrees with no tracking. There is an additional capex associated with the tracking system due to the additional control, monitoring and associated tracker system requirements, however the

¹Fourie, H. 2021. Palaeontological Impact Assessment: Desktop Study for the Sturdee Energy PPC Dwaalboom Solar Project Thabazimbi Local Municipality, Waterberg District Municipality, Limpopo Province

Levelised Cost of Electricity (LCOE) when considered over 20 years will be significantly lower than a fixed-tilt equivalent with all other variables held constant. This system thus has an advantage of providing a significantly lower LCOE owing to the greater solar PV yield. The tracker layout has been optimized to reduce shading significantly. This is achieved by spacing rows at a pitch of 6.5m apart thus preventing majority of inter-row shading losses and reducing back-tracking requirement. Where land is constrained, such as the De Hoek site, we had to reduce pitch distance to 4m to allow the full PV plant DC capacity to fit.

- Buildings.

- Substation & control room on site
- The building will be air-conditioned to maintain an adequate temperature-controlled environment for the electronic devices that will be housed within i.e. UPS, park controller, tracker controller, MV switchgear, etc
- Building will contain fire extinguishers, PPE, toolbox, spares, and working table for on-site personnel

- Civil Works

All civil works are designed to capable of withstand a 100-year storm event, including the effects of water, extreme winds and other natural disasters, without flooding, erosion, settlement or damage.

- Electrical Connections

For the interconnection with the existing PPC substation it is required to design, build and commissioning a new 11kV or 6.6kV overhead line (OHL) capable of evacuating up to 10MVA on a continual basis. Eskom Distribution standards and specifications will be used as the reference requirements to design, construct and commission the MV overhead lines.

PPC Dwaalboom Design Basis Summary:

Project Pre-design Input	PPC Dwaalboom Solar PV Plant Specification
Contracted Capacity (AC)	10MW
Maximum Export Capacity (AC)	10MW
Plant nameplate DC capacity	11MW
DC/AC Ratio	110%
PV module type	Jinko Tiger JKM460-7RL3 Mono-crystalline N-Type bifacial module
Number of modules	23 920
Number of module strings	920
Mounting structure	Single-axis ground-mount N-S tracker with back-tracking
Tracker specification	30x1 modules in portrait Pitch of 6.5m GCR = 34.8% Angle rotation +/-60°
Bi-facial system specification	Ground albedo = 20% Bi-faciality factor = 74% Rear shading factor = 5% Axis height above ground = 2m
Axis tilt	0 degrees
PV inverter type	Siemens Sinacon PV2500 2500kW 1500V outdoor grid-tied central inverter
Inverter continuous AC rated capacity	4x 2500kWac
Plant Transformer rating	4x 3MVA 400V/11kV
Plant grid interconnection voltage	11kV
Planned grid interconnection	1750m 11kV overhead line to PPC 11kV Main Distribution Substation

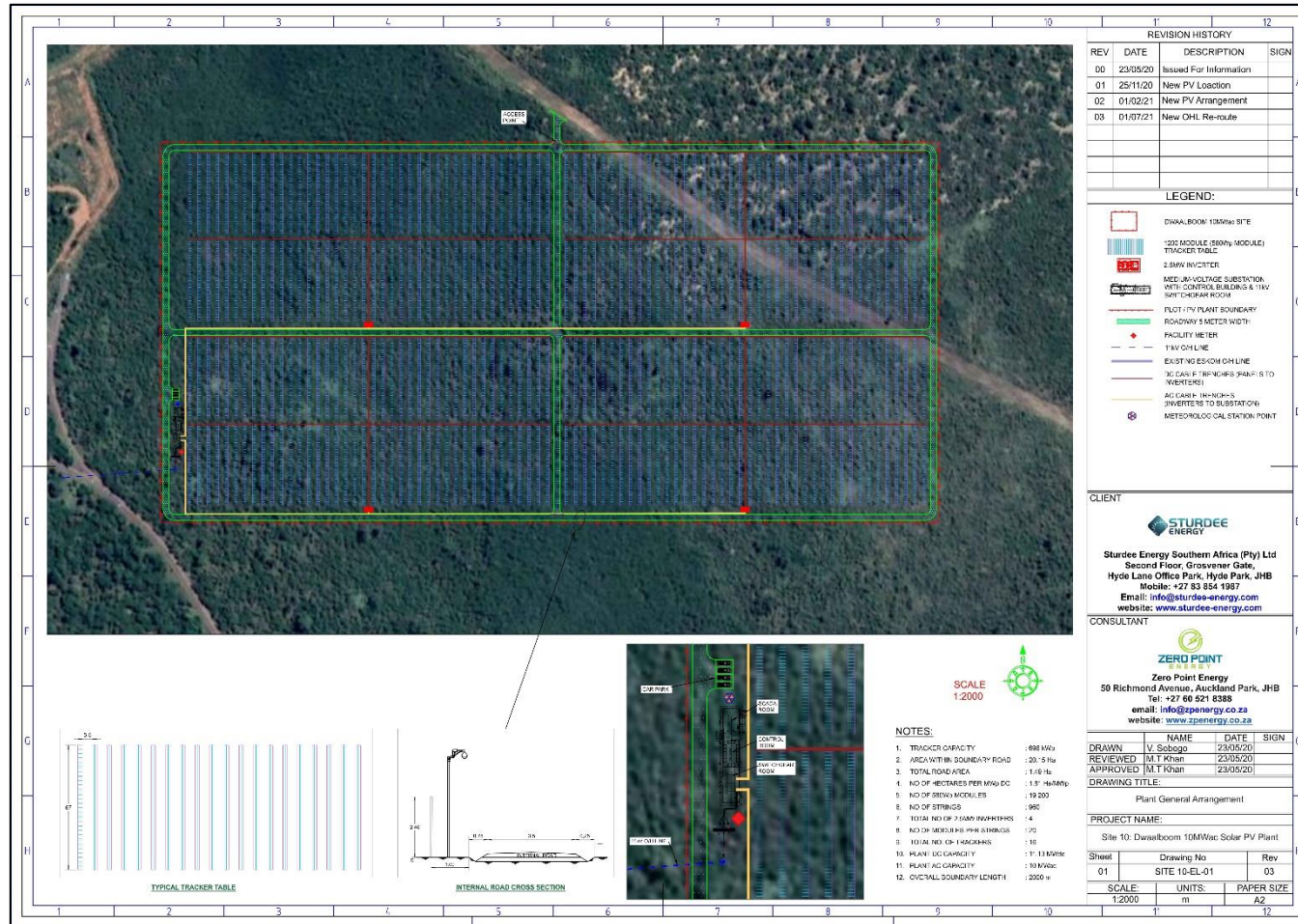


Figure 1-1: Map indicating the infrastructure layout proposed Sturdee Energy PPC Dwaalboom Solar Project.

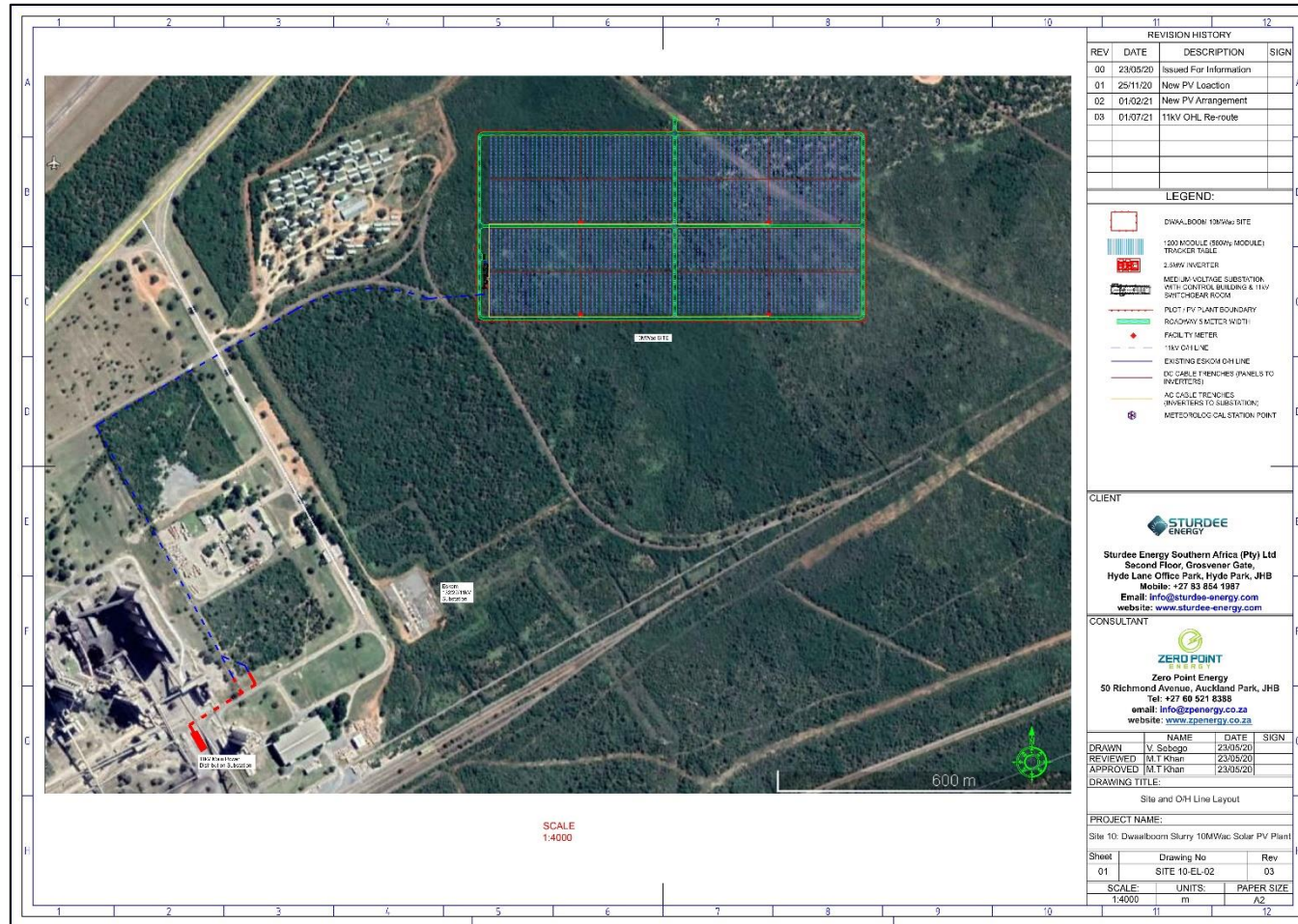


Figure 1-2: Aerial map indicating the placements of the Sturdee Energy PPC Dwaalboom Solar Plant and the proposed new New 11kV OHL Power Line.

1.4 Terms of Reference

Heritage specialist input into the Environmental Impact Assessment (EIA) process is essential to ensure that, through the management of change, developments still conserve our heritage resources. It is also a legal requirement for certain development categories which may have an impact on heritage resources. Thus, EIAs should always include an assessment of heritage resources. The heritage component of the EIA is provided for in the **National Environmental Management Act, (Act 107 of 1998)** and endorsed by section 38 of the **National Heritage Resources Act (NHRA - Act 25 of 1999)**. In addition, the NHRA protects all structures and features older than 60 years, archaeological sites and material and graves as well as burial sites. The objective of this legislation is to ensure that developers implement measures to limit the potentially negative effects that the development could have on heritage resources. Based hereon, this project functioned according to the following **terms of reference** for heritage specialist input:

- *Provide a detailed description of all archaeological artefacts, structures (including graves) and settlements as well as paleontological receptors which may be affected, if any.*
- *Assess the nature and degree of significance of such resources within the area.*
- *Establish heritage informants/constraints to guide the development process through establishing thresholds of impact significance.*
- *Assess and rate any possible impact on the archaeological and historical remains within the area emanating from the proposed development activities.*
- *Propose possible heritage management measures provided that such action is necessitated by the development.*
- *Liaise and consult with the South African Heritage Resources Agency (SAHRA). A Notification of Intent to Develop (NID) will be submitted to SAHRA at the soonest opportunity.*

1.5 CRM: Legislation, Conservation and Heritage Management

The broad generic term *Cultural Heritage Resources* refers to any physical and spiritual property associated with past and present human use or occupation of the environment, cultural activities and history. The term includes sites, structures, places, natural features and material of palaeontological, archaeological, historical, aesthetic, scientific, architectural, religious, symbolic or traditional importance to specific individuals or groups, traditional systems of cultural practice, belief or social interaction.

1.5.1 Legislation regarding archaeology and heritage sites

The South African Heritage Resources Agency (SAHRA) and its provincial offices aim to conserve and control the management, research, alteration and destruction of cultural resources of South Africa. It is therefore vitally important to adhere to heritage resource legislation at all times.

a. National Heritage Resources Act No 25 of 1999, section 35

According to the National Heritage Resources Act No 25 of 1999 (section 35) the following features are protected as cultural heritage resources:

- a. Archaeological artefacts, structures and sites older than 100 years
- b. Ethnographic art objects (e.g. prehistoric rock art) and ethnography

- c. Objects of decorative and visual arts
- d. Military objects, structures and sites older than 75 years
- e. Historical objects, structures and sites older than 60 years
- f. Proclaimed heritage sites
- g. Grave yards and graves older than 60 years
- h. Meteorites and fossils
- i. Objects, structures and sites of scientific or technological value.

In addition, the national estate includes the following:

- a. Places, buildings, structures and equipment of cultural significance
- b. Places to which oral traditions are attached or which are associated with living heritage
- c. Historical settlements and townscapes
- d. Landscapes and features of cultural significance
- e. Geological sites of scientific or cultural importance
- f. Archaeological and paleontological sites
- g. Graves and burial grounds
- h. Sites of significance relating to the history of slavery
- i. Movable objects (e.g. archaeological, paleontological, meteorites, geological specimens, military, ethnographic, books etc.)

With regards to activities and work on archaeological and heritage sites this Act states that:

“No person may alter or demolish any structure or part of a structure which is older than 60 years without a permit by the relevant provincial heritage resources authority.” (34. [1] 1999:58)

and

“No person may, without a permit issued by the responsible heritage resources authority-

- (a) destroy, damage, excavate, alter, deface or otherwise disturb any archaeological or palaeontological site or any meteorite;*
- (b) destroy, damage, excavate, remove from its original position, collect or own any archaeological or palaeontological material or object or any meteorite;*
- (c) trade in, sell for private gain, export or attempt to export from the Republic any category of archaeological or palaeontological material or object, or any meteorite; or*
- (d) bring onto or use at an archaeological or palaeontological site any excavation equipment or any equipment which assist in the detection or recovery of metals or archaeological and palaeontological material or objects, or use such equipment for the recovery of meteorites. (35. [4] 1999:58).”*

and

“No person may, without a permit issued by SAHRA or a provincial heritage resources agency-

- (a) destroy, damage, alter, exhume or remove from its original position or otherwise disturb the grave of a victim of conflict, or any burial ground or part thereof which contains such graves;*
- (b) destroy, damage, alter, exhume, remove from its original position or otherwise disturb any grave or burial ground older than 60 years which is situated outside a formal cemetery administered by a local authority;*
- (c) bring onto or use at a burial ground or grave referred to in paragraph (a) or (b) and excavation equipment, or any equipment which assists in the detection or recovery of metals (36. [3] 1999:60).”*

b. Human Tissue Act of 1983 and Ordinance on the Removal of Graves and Dead Bodies of 1925

Graves and burial grounds are commonly divided into the following subsets:

- a. ancestral graves
- b. royal graves and graves of traditional leaders
- c. graves of victims of conflict
- d. graves designated by the Minister
- e. historical graves and cemeteries
- f. human remains

Graves 60 years or older are heritage resources and fall under the jurisdiction of both the National Heritage Resources Act and the Human Tissues Act of 1983. However, graves younger than 60 years are specifically protected by the Human Tissues Act (Act 65 of 1983) and Ordinance on Excavations (Ordinance no. 12 of 1980) as well as any local and regional provisions, laws and by-laws. Such burial places also fall under the jurisdiction of the National Department of Health and the Provincial Health Departments.

c. National Heritage Resources Act No 25 of 1999, section 35

This act (Act 107 of 1998) states that a survey and evaluation of cultural resources must be done in areas where development projects, that will change the face of the environment, will be undertaken. The impact of the development on these resources should be determined and proposals for the mitigation thereof are made. Environmental management should also take the cultural and social needs of people into account. Any disturbance of landscapes and sites that constitute the nation’s cultural heritage should be avoided as far as possible and where this is not possible the disturbance should be minimized and remedied.

1.5.2 Background to HIA and AIA Studies

South Africa’s unique and non-renewable archaeological and palaeontological heritage sites are ‘generally’ protected in terms of the National Heritage Resources Act (Act No 25 of 1999, section 35) and may not be disturbed at all without a permit from the relevant heritage resources authority. Heritage sites are frequently threatened by development projects and both the environmental and heritage legislation require impact assessments (HIAs & AIAs) that identify all heritage resources in areas to be developed. Particularly, these assessments are required to make recommendations for protection or mitigation of the impact of the sites. HIAs and AIAs should be done by qualified professionals with adequate knowledge to (a) identify all heritage

resources including archaeological and palaeontological sites that might occur in areas of developed and (b) make recommendations for protection or mitigation of the impact on the sites.

A detailed guideline of statutory terms and requirements is supplied in Addendum 1.

2 REGIONAL CONTEXT

2.1 Area Location

The proposed Sturdee Energy PPC Dwaalboom Solar Project occurs on Portions of the farms Schoongezicht 238KP and Jakhalskraal 239KP in the Thabazimbi Local Municipality, Limpopo Province. The project area is situated approximately 60km southwest of the town of Thabazimbi at the PPC Dwaalboom Operations plant. The site lies south of a smaller provincial road which connects the town of Northam to Dwaalboom and Thabazimbi. The study areas appear on 1:50000 map sheet 2426DD (see Figure 2-1) and a key location point for the project is:

- **Site (Preferred): S24.806268° E26.841379°**

2.2 Area Description: Receiving Environment

The project area lies within the Savanna Biome which is the largest biome in Southern Africa, although the site itself is more representative of grassland. The Savanna Biome is characterized by a grassy ground layer and a distinct upper layer of woody plants e.g. trees and shrubs. The area is classified as microphyllous woodland forming part of the Dwaalboom Thornveld vegetation type. The geomorphology of the area is characterised by red-yellow apedal, freely drained soils and the geology consists mostly out of granite and granite-gneiss of the Archaean Complex, as well as Tertiary and Quaternary sediments. The study area falls within Quaternary catchment A32B and the Limpopo Water Management Area (WMA) with its main drainage being the Marico River. No drainage channels occur on the site and the main drainage is by way of surface sheet flow.

2.3 Site Description

The proposed project is situated in a rural agricultural zone along in the western Waterberg Biosphere. The area has been impacted on by farming practices during the last century where portions of the Schoongezicht and Jakhalskraal property subject to this assessment has been transformed into cultivated lands in past decades. The region consists mostly of crop, cattle and game farms but an increasing number of mines and quarries occur around rich limestone and cement resources.

Agriculture has resulted in severe bush densification with alien species such as Sickle Bush occurring through the project area in dense, impenetrable stands. Pockets of indigenous grassland and Bushveld vegetation remain in places and the rest of the terrain is undulated with a number of drainage lines bisecting the larger landscape. A Transnet railway line routes along the western boundary of the site and the the PPC Dwaalboom Operations plant occurs further to the west

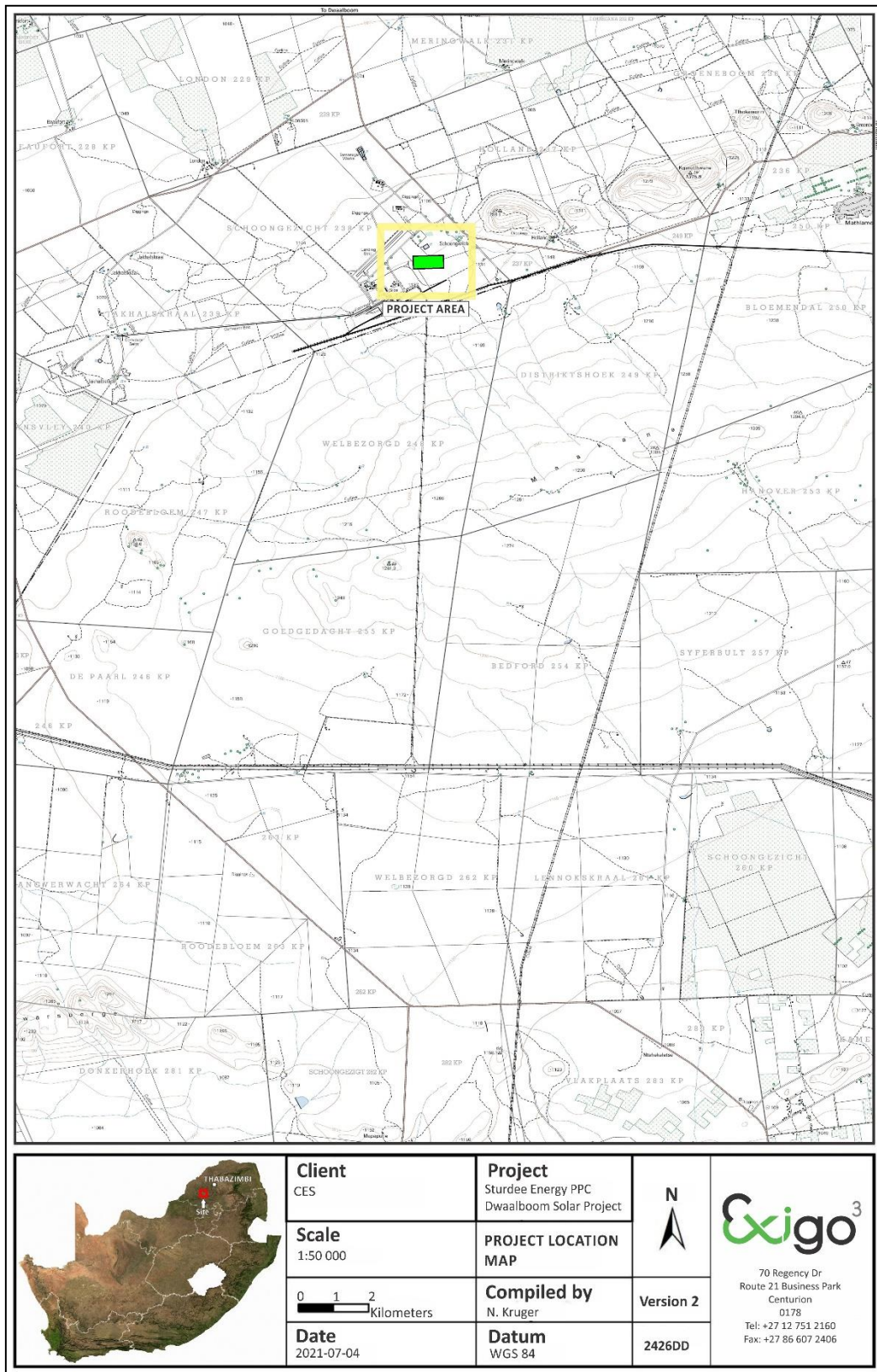


Figure 2-1: 1:50 00 Map representation of the location of the proposed Sturdee Energy PPC Dwaalboom Solar Project (sheet 2426DD).



Figure 2-2: Aerial map providing a regional context for the proposed Sturdee Energy PPC Dwaalboom Solar Project.

3 THE PROJECT HERITAGE LANDSCAPE

3.1 The Paleontological Landscape (refer to Fourie 2021 in Addendum 4)

3.1.1 Regional Geological History

Over areas totalling fully 40% of Southern Africa the 'hard rocks', from the oldest to the Quaternary, are concealed by normally unconformable deposits – principally sand, gravel, sandstone, and limestone. Inland deposits are much more extensive than marine deposits and are terrestrial and usually unfossiliferous. Some of these deposits date back well into the Tertiary, whereas others are still accumulating. Owing to the all-to-often lack of fossils and of rocks suitable for radiometric or palaeomagnetic dating, no clear-cut dividing line between the Tertiary and Quaternary successions could be established (Kent 1980). The alluvium sands were deposited by a river system and reworked by wind action (Snyman 1996). A thick cover of Kalahari reddish sand blankets most outcrops and is dominated by the typical Kalahari thornveld (Norman and Whitfield 2006).

The Chuniespoort Group, Transvaal Supergroup, is made up of chemical and biochemical sediments such as dolomite, chert, limestone and banded iron formation, carbonaceous shale is also present. At the top of the Malmani Subgroup is the Deutschland Formation underlain by the Penge and Monte Christo Formations. Sandstone is mostly absent. Cave formation in the dolomite is a major concern in developing areas, especially in the 1500m thick dolomite of the Malmani Subgroup. Chemical sediments such as fine-grained limestone and dolomite is made up of deposits of organically derived carbonate shells, particles or precipitate. Dolomite is magnesium-rich limestone formed from algal beds and stromatolites.

The Black Reef Formation of the Transvaal Supergroup consists of quartzite with lenses of grit and conglomerate. Shale is always present, particularly near the top close to the contact with the overlying dolomite (Kent 1980). It is Vaalian in age and not very thick, only up to 500m in the north-east. It contains a fair amount of gold and the limestone is mined (Snyman 1996).

The Ventersdorp Supergroup consists mainly of andesitic lava, tuff and agglomerate. The Klipriviersberg Group and the Platberg Group are Randian in age, where the Rietgat Formation is Vaalian in age (Sheet information 2626 Wes Rand). The Ventersdorp Supergroup sits disconformably on the Witwatersrand Supergroup and is made up of the lower Klipriviersberg Group, the middle Platberg Group, and two formations (Bothaville and Allanridge). Together it can reach a maximum thickness of 4,260 m in some areas. It is described as an elliptical basin named after the town of Ventersdorp. Sediments accumulated in fault-bounded troughs or grabens and gold can be present (Norman and Whitfield 2006).

The Archaean Complex is probably similar to the Halfway House Dome granite. It occurs north-west of Thabazimbi, between Klerksdorp and Ventersdorp, south of Lichtenburg, west of Schweizer-Reneke and west of Mafikeng (Visser 1989).

A very wide range of possible fossil remains occur in the Cenozoic (Quaternary), though these are often sparse, such as: mammalian bones and teeth, tortoise remains, ostrich eggshells, non-marine mollusc shells, ostracods, diatoms, and other micro fossil groups, trace fossils (e.g. calcretised termitaria, rhizoliths, burrows, vertebrate tracks), freshwater stromatolites, plant material such as peats, foliage, wood, pollens, within calc tufa. Stromatolite structures range from a centimetre to several tens of metres in size. They are the result of algal growth in shallow water, indicating a very rich growth that would have caused an enrichment in the amount of oxygen in the atmosphere (Groenewald and Groenewald 2014).

Chemical sediments such as fine-grained limestone and dolomite of the Malmani Subgroup, Chuniespoort Group, is made up of deposits of organically derived carbonate shells, particles or precipitate. Dolomite is magnesium-rich limestone formed from algal beds and stromatolites. These Early Proterozoic Transvaal stromatolitic dolomites formed and released free oxygen at around 2900 – 2400 Ma. Stromatolites are common in the Malmani dolomites, accepted to be the fossil remnants of the simplest single-celled organisms. They are finely layered, concentric, mound-like structures formed by microscopic algal organisms (Norman and Whitfield 2006). These can range in size from 3.5 - 17 mm in height and up to 10 mm in diameter and can be present in the development area.

The Black Reef Formation is known for stromatolite carbonates and fossiliferous Late Cenozoic cave breccias similar to the Malmani dolomite. Algal microfossils are reported from shales and are probably from diagenetic origin. Stromatolites are preserved in the subordinate carbonate rocks.

Stromatolites may also be present in the Ventersdorp Supergroup

3.1.2 Local Geology

The only project option presented is situated on the Malmani Subgroup, Black Reef Formation, Quaternary, Ventersdorp Supergroup and Archaean Complex. One of the formations in the development area may contain fossils. Nixon *et al.* (1988) described the black shales south-west of Potchefstroom as consisting of overlapping laminated basal mounds which are stromatolitic as well as spheroidal possible planktonic fossil algae. These can range in size from 3.5 - 17 mm in height and up to 10 mm in diameter and can be present in the development area.

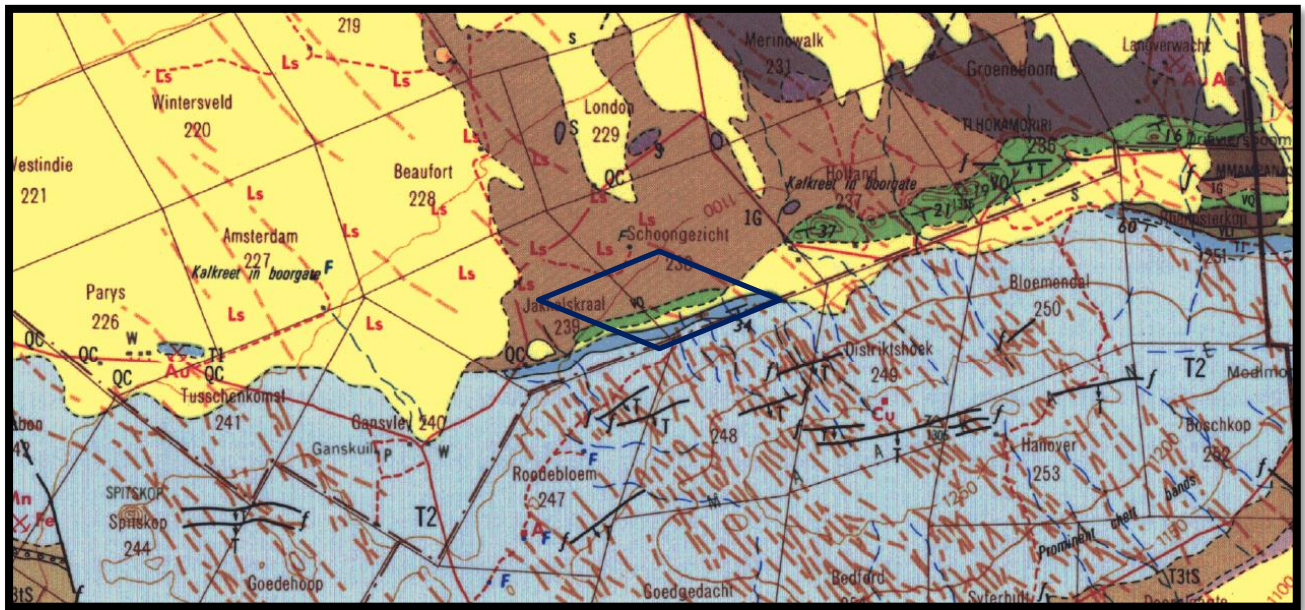


Figure 3-1: The geology of the development area.

Legend to map and short explanation.

- Qc – Black soil, ferricrete (Qrf), surface conglomerate or breccia and fan-glomerate (QR), calcrete, surface limestone (Qc) (yellow). Quaternary. [M]
- T1 – Dolomite, chert, shale, locally with interbedded quartzite [::] (blue). Dolomite Series, Malmani Subgroup, Chuniespoort Group, Transvaal Supergroup. Vaalian. [H]
- T2 – Quartzite, grit, conglomerate, shale (dark blue). Black Reef Formation, Transvaal Supergroup. Vaalian. [M]
- VQ – Quartzite, arkose, conglomerate (green). Ventersdorp Supergroup. Vaalian. [L]
- IG – Granite and granite-gneiss including small scattered occurrences of Swaziland System; largely covered (brown). Western Transvaal belt of metamorphism and mobilization, Archaean Complex. [L]
- – (black) Lineament (Landsat, aeromagnetic).
- - Concealed geological boundary.
- ↯37° – Strike and dip of bed.
- – Proposed development (blocked in dark blue).

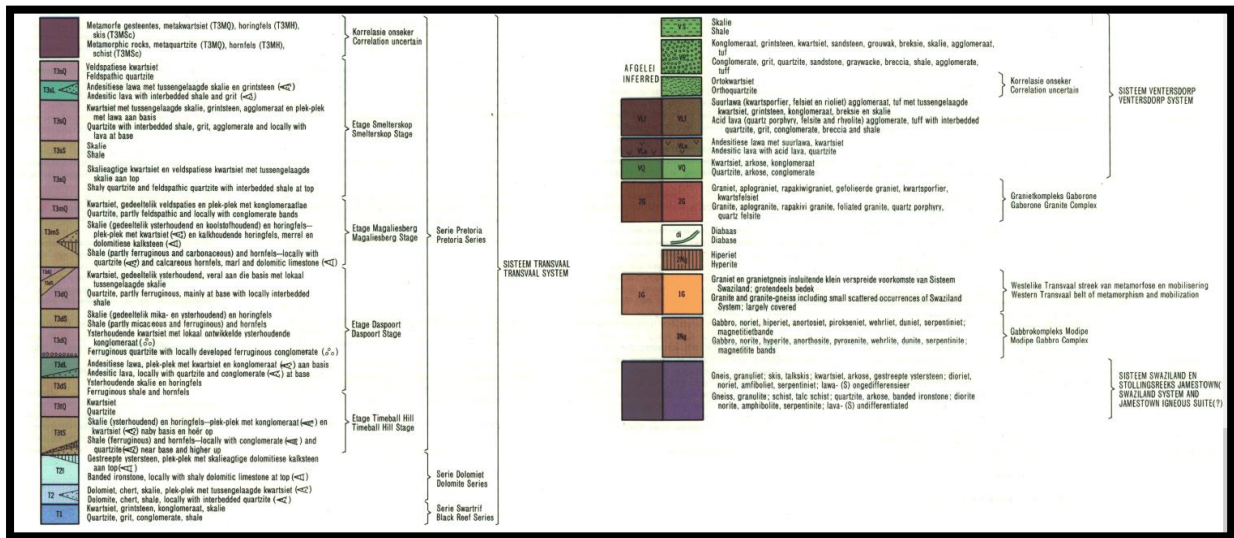


Figure 3-2: Lithostratigraphy (Schutte 1974).



Figure 3-3: Photograph of a stromatolite (E. Butler).

	Duitschland (Vd)		Conglomerate	No fossils recorded	Good examples of stromatolites in Cradle of Humankind region ALERT FOR POTENTIALLY FOSSILIFEROUS LATE CAENOZOIC CAVE BRECCIAS WITHIN "TRANSVAAL DOLOMITE" OUTCROP AREA (breccias not individually mapped)
	Penge (Vp)		Iron-rich shale	Stromatolites	
			Stromatolitic carbonates (limestones / dolomites), minor secondary cherts, mudrocks including carbonaceous shales	Range of shallow marine to intertidal stromatolites (domes, columns etc), organic-walled microfossils	
	Black Reef (Vbr)		Siliciclastic sediments (mature sandstones plus minor mudrocks, conglomerates) deposited during a fluvial to shallow marine transition	Possible equivalent of Black Reef Fm in N. Cape (Vryburg Formation) contains stromatolitic carbonates	

VENTERSDORP (Rv; Rv1; Rv2; Rv3; Rv4; Rv5; Rv6; Rv7)	KUIPRIVERSBERG (Rk)		Rai	Predominantly basic lavas with minor metamorphosed sediments (breccias, conglomerates, quartzites) at base of succession Late Archaean (Randian) c. 2.7-2.5 Ga	Lacustrine stromatolites are recorded within the upper Ventersdorp Supergroup (Platberg Group) in the Free State but this younger succession is not mapped in Limpopo	Small outcrop area in W. Limpopo
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ARCHAEOAN GREENSTONE BELTS	Rhenosterkoppies Pietersburg Belts (Zp) Zza		Mothiba (Zmt; Zmt1) Eersteling (Ze) Vrishgewaagd (Zv)	Predominantly volcanic igneous rocks, plus some igneous intrusions, minor sediments such as banded iron formation, chert, quartzite, conglomerate, schists (e.g. Pietersburg Group, Uitkyk Fm, Giyani Group, Gravelotte Group) Rocks usually tectonized, highly metamorphosed Early to Mid Archaean (Swazian - Randian) 3.5 - 3 Ga Basic intrusions dated 3.5 Ga and younger	Archaean microfossils and microbial trace fossils (bacterial borings) have been recorded from cherts and volcanic glasses in similar-aged greenstone belts elsewhere in RSA (e.g. Fig Tree Group Onverwacht Group of Barberton Greenstone Belt, Mpumalanga Swaziland). "Fly speck carbon" in sedimentary Uitkyk Fm of the Pietersburg Greenstone Belt, Limpopo, may be fossilised microbes, or alternatively of inorganic origin (e.g. an inorganic precipitate induced by radioactive irradiation).	Greenstone Belts provide samples of the oldest known crustal rocks, including minor marine and terrestrial sediments, but the rocks here are usually highly deformed and metamorphosed
	Giyani (Sutherland) Belt (Zg1; Zg11; Zg12; Zg13; Zg14; Zg15)					
	Bandelierkop (Zba1)		Zba1; Zba2; Zba3; Zba4			
	Murchison Belt (Zmu)		Zi; Zg; Zg1; Zg2; Zg3; Zg4; Zru			
	Makoppa Dome greenstones (Z)					

Fossils in South Africa mainly occur in rocks of sedimentary nature and not in rocks from igneous or metamorphic nature. Therefore, if there is the presence of Karoo Supergroup strata the palaeontological sensitivity is generally **LOW** to **VERY HIGH**.

A very wide range of possible fossil remains occur in the Cenozoic, though these are often sparse, such as: mammalian bones and teeth, tortoise remains, ostrich eggshells, non-marine mollusc shells, ostracods, diatoms, and other micro fossil groups, trace fossils (e.g. calcretised termitaria, rhizoliths, burrows, vertebrate tracks), freshwater stromatolites, plant material such as peats, foliage, wood, pollens, within calc tufa. Stromatolite structures range from a centimetre to several tens of metres in size. They are the result of algal growth in shallow water, indicating a very rich growth that would have caused an enrichment in the amount of oxygen in the atmosphere (Groenewald and Groenewald 2014).

Fossils will be present in caves, calctufa and pans and examples are a wide range of mammalian bones and teeth, tortoise remains, ostrich egg, non-marine mollusc shells, ostracods, diatoms, other micro fossils, trace fossils, stromatolites, plant remains and wood (Groenewald and Groenewald 2014).

Stromatolites are significant indicators of palaeoenvironments and provide evidence of algal growth between 2640 and 2432 million years ago (Groenewald and Groenewald 2014). Caves in the Malmani dolomite (Vmd) of the Transvaal Supergroup provided a refuge for man’s distant ancestors (Norman and Whitfield 2006). These caves are also home to Middle and Late Stone Age cultures. The cave breccia in the Cradle of Humankind, near Johannesburg, yielded internationally renowned hominins such as *Australopithecus africanus and robustus* and extinct mammals and other fauna. The caves are actively being researched and excavated and this has led to many international collaborations. The caves are filled with sediments from the Kalahari Group.

Chemical sediments such as fine-grained limestone and dolomite of the Malmani Subgroup is made up of deposits of organically derived carbonate shells, particles or precipitate. Dolomite is magnesium-rich limestone formed from algal beds and stromatolites. These Early Proterozoic Transvaal stromatolitic dolomites formed and released free oxygen at around 2900 – 2400 Ma. Stromatolites are common in the Malmani dolomites, accepted to be the fossil remnants of the simplest single-celled organisms. They are finely layered, concentric, mound-like structures formed by microscopic algal organisms (Norman and Whitfield 2006). Chert may contain fossils such as echinoids or sponges if nodular, although not common and is rated unlikely.

In the rocks overlying the Black Reef Formation there is evidence for life on an abundant scale as cyanobacteria came to dominate the shallow sea forming stromatolites of varying shapes. Large, elongate stromatolite domes can be seen at Boetsap in the North West Province (McCarthy and Rubidge 2005) and the algal microfossils reported from the Time Ball Hill Formation shales are probably of diagenetic origin (Eriksson 1999).

3.2 The Archaeological Landscape

Archaeology in Southern Africa is typically divided into two main fields of study, the **Stone Age** and the **Iron Age** or **Farmer Period**. The following table provides a concise outline of the chronological sequence of periods, events, cultural groups and material expressions in Southern African pre-history and history.

Table 1 Chronological Periods across Southern Africa

Period	Epoch	Associated cultural groups	Typical Material Expressions
Early Stone Age 2.5m – 250 000 YCE	Pleistocene	Early Hominins: <i>Australopithecines</i> <i>Homo habilis</i> <i>Homo erectus</i>	Typically large stone tools such as hand axes, choppers and cleavers.

Middle Stone Age 250 000 – 25 000 YCE	Pleistocene	First <i>Homo sapiens</i> species	Typically smaller stone tools such as scrapers, blades and points.
Late Stone Age 20 000 BC – present	Pleistocene / Holocene	<i>Homo sapiens sapiens</i> including San people	Typically small to minute stone tools such as arrow heads, points and bladelets.
Early Iron Age / Early Farmer Period 300 – 900 AD (commonly restricted to the interior and north-east coastal areas of Southern Africa)	Holocene	First Bantu-speaking groups	Typically distinct ceramics, bead ware, iron objects, grinding stones.
Middle Iron Age (Mapungubwe / K2) / early Later Farmer Period 900 – 1350 AD (commonly restricted to the interior and north-east coastal areas of Southern Africa)	Holocene	Bantu-speaking groups, ancestors of present-day groups	Typically distinct ceramics, bead ware and iron / gold / copper objects, trade goods and grinding stones.
Late Iron Age / Later Farmer Period 1400 AD -1850 AD (commonly restricted to the interior and north-east coastal areas of Southern Africa)	Holocene	Various Bantu-speaking groups including Venda, Thonga, Sotho-Tswana and Zulu	Distinct ceramics, grinding stones, iron objects, trade objects, remains of iron smelting activities including iron smelting furnace, iron slag and residue as well as iron ore.
Historical / Colonial Period ±1850 AD – present	Holocene	Various Bantu-speaking groups as well as European farmers, settlers and explorers	Remains of historical structures e.g. homesteads, missionary schools etc. as well as, glass, porcelain, metal and ceramics.

3.3 Discussion: The Waterberg Heritage Landscape

The cultural landscape of the Waterberg encompasses a period of time that spans millions of years, covering human cultural development from the Stone Ages up to recent times. It depicts the interaction between the first humans and their adaptation and utilization to the environment, the migration of people, technological advances, warfare and contact and conflict. Resources, and in particular mineral resources, in what is now known as the Thabazimbi region have been extensively utilised by prehistoric and historic groups. The greater region has several important Stone Age localities with deep occupation deposits and importantly, a widespread occurrence of open-air sites. The shelter site of Olieboomspoort near Lephalale show a succession from the Earlier, Middle and Later Stone Ages (ESA, MSA and LSA) and up to historic times (van der Ryst 2006). Early Iron Age (EIA) localities such as Diamant are particular important. At this locality in the western Waterberg the EIA facies of Diamant was first identified at the eponymous locality (Huffman 1990). Diamant has also delivered the earliest evidence for glass trade beads and domesticated dogs in the Limpopo Province (van der Ryst 2006). The movement of African farmers into this region is documented by their ceramics and settlements (Huffman 2007b). The later occupations of agropastoralists groups are complex (Schapera 1942, 1965; Breutz 1953, 1989; Bergh 1998). The accounts of early travellers provide important data on the fauna, flora and inhabitants of the Waterberg. The observations of travellers, missionaries and hunters who traversed the region throughout the 18th and the 19th centuries constitute a source of implicit ethnography on the late presence of hunting and gathering groups, the African farmers and inmoving colonists (Baines 1872, 1877; Smith 1836; Schlömann 1896; Wallis [Baines] 1946; Burke [Mauch's journals]

1969). The region is also rich in rock art (Eastwood and Eastwood 2006).

3.3.1 Early History and the Stone Ages

According to archaeological research, the earliest ancestors of modern humans emerged some two to three million years ago. The remains of Australopithecine and *Homo habilis* have been found in dolomite caves and underground dwellings in the Riverton Area at places such as Sterkfontein and Swartkrans near Krugersdorp. *Homo habilis*, one of the Early Stone Age hominids, is associated with Oldowan artefacts, which include crude implements manufactured from large pebbles. The Acheulian industrial complex replaced the Oldowan industrial complex during the Early Stone Age. This phase of human existence was widely distributed across South Africa and is associated with *Homo erectus*, who manufactured hand axes and cleavers from as early as one and a half million years ago. Middle Stone Age sites dating from as early as two hundred thousand years ago have been found all over South Africa. Middle Stone Age hunter-gatherer bands also lived and hunted in the Orange and Vaal River valleys. These people, who probably looked like modern humans, occupied campsites near water but also used caves as dwellings. They manufactured a wide range of stone tools, including blades and points that may have had long wooden sticks as hafts and were used as spears. Excavations at Makapansgat near to Mokopane provided evidence of occupation by *Australopithecus africanus* from approximately 3.3 million years ago. There is evidence of long occupation from the Cave of Hearths with stone tools and associated debris from a date of 400,000 B.P. while upper strata are characterised by Middle Stone Age assemblages of 110,000 to 50,000 B.P. and Late Stone Age assemblages dating from 10,000 to 5,000 years B.P. characterised by the Smithfield B industry. The site is one of the few to exhibit Acheulean assemblages in Southern Africa and also contains overlying Middle Stone Age Howiessonspoort industry tools and early evidence of fire use (Bergh, 1999; Mitchell, 2002). Both ESA and MSA sites are known from the Limpopo Valley as well as lithic industries that appear to be transitional between the two ages and with dates estimated at 300,000 years ago (Kuman et al. 2005). The presence of numerous rock art sites with associated stone tool assemblages in the Limpopo River basin, Blouberg, Makgabeng, Waterberg and Soutpansberg attests to the presence of Late Stone Age San/Bushman communities across the region (e.g. Pager, 1973; Eastwood et al., 2002). The Central Limpopo Basin, including the Soutpansberg, Limpopo Valley, the Blouberg-Makgabeng area and the Pafuri area, has over 700 documented rock art sites and is one of the few regions where paintings and engravings occur, sometimes at the same site (Eastwood and Hanisch 2003).

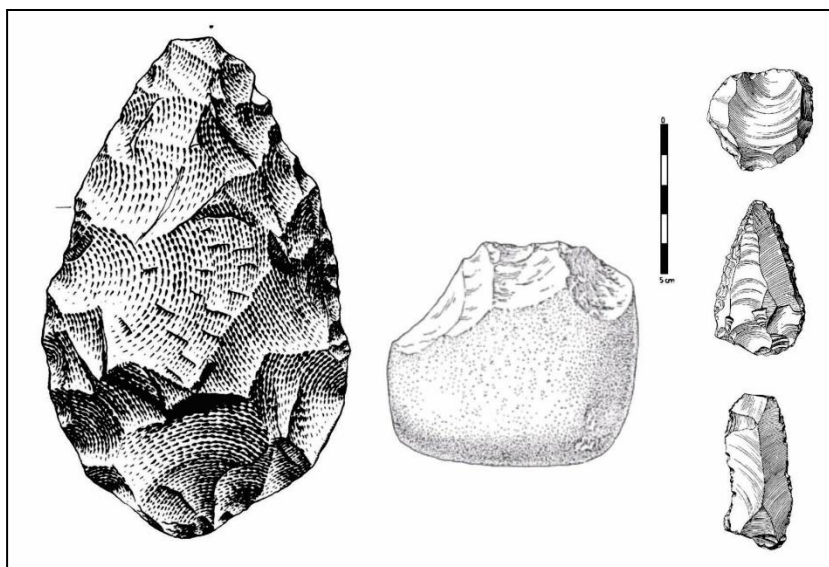


Figure 3-4: Typical ESA handaxe (left) and cleaver (center). To the right is a MSA scraper (right, top), point (right, middle) and blade (right, bottom).

The cultural historical landscape of the Waterberg area spans million years with evidence of hominin occupation, Stone Age traditions, Iron Age farmers and historical events. Makapansgat, a deep limestone cave near Mokopane has yielded remains of *Australopithecus africanus* that dates to more than 3 million years BP and also *Homo erectus*, dating to approximately 1 million years BP. However, Earlier Stone Age (ESA) material is scarce on the Waterberg plateau. The Middle Stone Age (MSA) is abundantly represented in the Waterberg area and archaeological excavations at sites such as the Olieboomspoor Shelter in the north-western part of the Waterberg have yielded rich MSA deposits which display a large degree of specialisation and skill in stone working (Van der Ryst 1996). These groups occupied open camps which were situated in the proximity of water sources such as pans, lakes or rivers. There is a noticeable gap in the Waterberg between MSA assemblages and material from the Later Stone Age (LSA), suggesting that the Waterberg may not have seen dense human occupation for a long period of time. However, Later Stone Age groups, including the San hunter gatherers and Khoi herders frequented the area in the last few millennia, and numerous LSA sites have been discovered and excavated. Similarly, LSA evidence such as stone implements, ceramics and a wealth of rock paintings and markings are scattered over the plateau.

3.3.2 Rock Art of the Waterberg Landscape

The Waterberg Plateau is rich in rock art and rock markings and many such sites are still to be described and studied. At many sites "refined" San paintings occur with cruder depictions in red or white paint (sometimes black), painted directly with fingers by later Farmer groups. Numerous paintings of people in trance positions, dance scenes of men and women, men with hunting equipment, a large variety of antelope and other animals, imaginary rain animals, handprints, and geometric designs form part of the contents of the rock art of the Waterberg (Van der Ryst 1998). Two traditions of Rock Art occur in the Waterberg. First the more "naturalised" form of fine-line art, including skilled depictions of animals and people, attributed to San Hunter Gatherers. The second tradition, often called "Late White" art, is characterised by more geometric, schematic illustrations which includes a large amount of finger painting. This tradition is associated with Iron Age farmers.

3.3.3 Pastoralism and the last 2000 years

Until 2000 years ago, hunter-gatherer communities traded, exchanged goods, encountered and interacted with other hunter-gatherer communities. From about 2000 years ago the social dynamics of the Southern African landscape started changing with the immigration of two 'other' groups of people, different in physique, political, economic and social systems, beliefs and rituals. One of these groups, the Khoekhoe pastoralists or herders entered Southern Africa with domestic animals, namely fat-tailed sheep and goats, travelling through the south towards the coast. They also introduced thin-walled pottery common in the interior and along the coastal regions of Southern Africa. Their economic systems were directed by the accumulation of wealth in domestic stock numbers and their political make-up was more hierarchical than that of the hunter-gatherers.

3.3.4 Iron Age / Farmer Period

The beginnings of the Iron Age (Farmer Period) in Southern Africa are associated with the arrival of a new Bantu speaking population group at around the third century AD. These newcomers introduced a new way of life into areas that were occupied by Later Stone Age hunter-gatherers and Khoekhoe herders. Distinctive features of the Iron Age are a settled village life, food production (agriculture and animal husbandry), metallurgy (the mining, smelting and working of iron, copper and gold) and the manufacture of pottery. Iron Age people moved into Southern Africa by c. AD 200, entering the area either by moving down the coastal plains, or by using a more central route. From the coast they followed the various rivers inland. Being cultivators, they preferred rich alluvial soils. The Iron Age can be divided into three phases. The Early Iron Age includes the majority of the first millennium A.D. and is characterised by traditions such as Happy Rest and Silver

Leaves. The Middle Iron Age spans the 10th to the 13th Centuries A.D. and includes such well known cultures as those at K2 and Mapungubwe. The Late Iron Age is taken to stretch from the 14th Century up to the colonial period and includes traditions such as Icon and Letaba.

Early Sotho-Tswana History

Within a larger archaeological context, Iron Age settlement representations in the form of stone walling in the Waterberg can undoubtedly be traced back to ancestral Sotho-Tswana occupation and developments from the sixteenth century AD onwards. Diagnostic pottery assemblages are commonly used in the South African Iron Age to infer group identities and to trace movements across the landscape. Similarly, the migration of the Sotho-Tswana speakers in South Africa in the 16th century marked a new ceramic style, known as Moloko. The Moloko Tradition can be divided into two phases: an early phase (e.g. Icon) in which sites were usually located at the foot of hills and contained little or no stone walling; and a later phase characterised by extensive stone wall complexes which were often erected on hills. In the Waterberg area, this later phase manifested in the Madikwe ceramic facies with pottery typically displaying stab and fingernail impression decoration motives. At around the 17th century, Madikwe pottery developed into a tradition known as “Buispoort”, sites of which display complex and elaborate stone walling. The stone walls were erected to construct stock byres and to demarcate residential units where pole-and-dagha (clay) huts were placed.

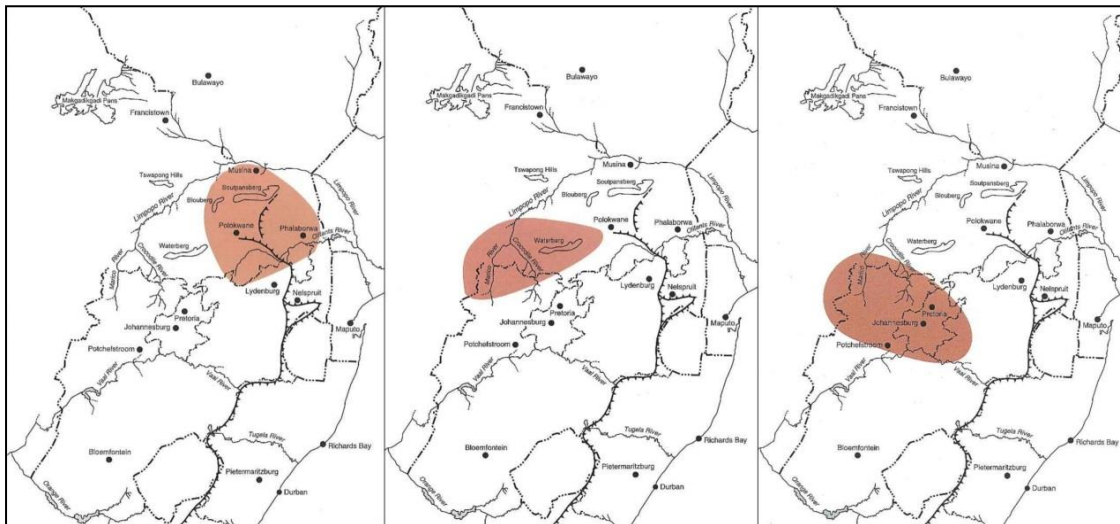


Figure 3-5: Map detailing the distribution of 16th century Maloko (left), 17th century Madikwe (centre) and 18th century Buispoort tradition sites (After Huffman 2007).



Figure 3-6: Ceramic decoration motives typical of 17th century Madikwe (left) and later Buispoort (right) facies (After Huffman 2007).

In addition, various Sotho-Tswana groups were found in the interior of the Highveld areas of South Africa by the end of the 18th century. These units occupied a large area, from present-day Botswana across large sections of the old Transvaal, the Free State Province into the Northern Cape. Based on Sotho-Tswana oral histories various groups acted as cores from which the Sotho-speaking communities sprouted.

3.3.5 Later History: Reorganization, Colonial Contact and living heritage.

The Historical period in Southern Africa encompass the course of Europe's discovery of South Africa and the spreading of European settlements along the East Coast and subsequently into the interior. In addition, the formation stages of this period are marked by the large-scale movements of various Bantu-speaking groups in the interior of South Africa, which profoundly influenced the course of European settlement. Finally, the final retreat of the San and Khoekhoen groups into their present-day living areas also occurred in the Historical period in Southern Africa.

The Waterberg was considered remote and inaccessible by early white migrants from the south and, with the exception of a few hunting and trading expeditions passing through, the area was one of the last regions in the former Transvaal to be permanently occupied by white farmers. Although the first Voortrekker farmers moved into the Waterberg during the 1850's, the region has been increasingly occupied on a regular basis only since the early part of the twentieth century. The early historical period of the area is dominated by the siege of Makapansgat where in September 1854, Chief Makapane and over 1 500 of his people died of hunger, dehydration and injuries after being besieged in the cave by a Boer commando in retaliation for an attack on a Voortrekker settlement. The majority of farms in the Waterberg area were surveyed in the late 1860's as part of the Transvaal government's strategy to settle white farmers in the Waterberg region. At that time, access to the Waterberg plateau was circuitous and difficult with the shortest route extending via Sandrivierspoort near present-day Vaalwater. After a railway line to Vaalwater was completed in the 1920's, maize became an economically viable crop but by the end of the 1960's, slumps in maize prices resulted in many farmers abandoning crop farming in favour of cattle. Large scale iron ore mining has emerged to become a primary economical enterprise in recent years. However, farming communities have settled in the landscape at the beginning of the 20th century.

The farms Schoongezicht and Jakhalskraal in the Thabazimbi District were established towards the end of the 19th century.

4 METHODOLOGY

4.1 Sources of Information: PDA

Please refer to Fourie 2021 (see Addendum 4).

4.2 Sources of Information: AIA

Data from detailed desktop, aerial and field studies were interrogated in order to sample surface areas systematically and to ensure a high probability of heritage site recording.

4.2.1 Desktop Study

The larger landscape of Waterberg has been well documented in terms of its archaeology and history. A desktop study was prepared in order to contextualize the proposed project within a larger historical milieu. Numerous academic papers and research articles supplied a historical context for the project area and archival sources, aerial photographs, historical maps and local histories were used to create a baseline of the

landscape's heritage. In addition, the study drew on available unpublished Heritage Assessment reports to give a comprehensive representation of known sites in the study area. These included:

- Hutten, M. 2013c. HIA for the proposed solar park development on the farm Aapieskruil near Koedoeskop, Limpopo Province. Compiled for: Jonk Begin Omgewingsdienste.
- Fourie, W. 2012. Wachteenbietjesdraai 350 KQaAnd Kwaggashoek 345 KQ Heritage Impact Report on proposed mining activities of Project Phoenix. PGS Heritage Consultants
- Fourie, W. 2014. Proposed Development of the Steenbokpan Extension 3 Township on the Remainder and Portions 1, 2, 3 and 4 of the Farm Grootdoorn 292 LQ, Portions 20, 22 and 25 of the Farm Theunispan 293 LQ and Portion 3 of the Farm Steenbokpan 295 LQ at Steenbokpan, Lephalale Local Municipality, Waterberg District, Limpopo Province. Client: Flexilor Properties (Pty) Ltd . PGS Heritage Consultants
- Van Schalkwyk, J.A. 1994. A survey of archaeological and cultural historical resources in the Amandelbult mining lease area. Unpublished report 94KH03. Pretoria: National Cultural History Museum.
- Van Schalkwyk, J.A. 2001. A survey of cultural resources in two development areas, Amandelbult, Northern Province. Unpublished report 2001KH13. Pretoria: National Cultural History Museum.
- Van Schalkwyk, J.A. 2003. A survey of archaeological sites for the Amandelbult Platinum Mine Seismic exploration program. Unpublished report 2003KH16. Pretoria: National Cultural History Museum.
- Van Schalkwyk, J.A. 2004. Heritage impact report for the Amandelbult electricity sub-transmission lines, Amandelbult Platinum Mine, Limpopo Province. Unpublished report 2004KH32. Pretoria: National Cultural History Museum.
- Van Schalkwyk, J. 2007. Survey of heritage resources in the location of the proposed Merensky Mining Project, Amandelbult Section, Rustenburg Platinum Mine, Limpopo Province. Prepared For WSP Environmental.
- Van Vollenhoven, A. July 2013. A Report on a Cultural Heritage Impact Assessment for the Continental Limestone Mine, close to Thabazimbi, Limpopo Province.

4.2.2 Aerial Survey

Aerial photography is often employed to locate and study archaeological sites, particularly where larger scale area surveys are performed. The site assessment of the project area relied heavily on this method to assist the challenging site survey. Here, depressions, variation in vegetation, soil marks and landmarks were examined and specific attention was given to shadow sites (shadows of walls or earthworks which are visible early or late in the day), crop mark sites (crop mark sites are visible because disturbances beneath crops cause variations in their height, vigour and type) and soil marks (e.g. differently coloured or textured soil (soil marks) might indicate ploughed-out burial mounds). Attention was also given to moisture differences, as prolonged dampening of soil as a result of precipitation frequently occurs over walls or embankments. In addition, historical aerial photos obtained during the archival search were scrutinized and features that were regarded as important in terms of heritage value were identified and if they were located within the boundaries of the project area they were physically visited in an effort to determine whether they still exist and in order to assess their current condition and significance. By superimposing high frequency aerial photographs with images generated with Google Earth as well as historical aerial imagery, potential sensitive areas were subsequently identified, geo-referenced and transferred to a handheld GPS device. These areas served as reference points from where further surveys were carried out.

4.2.3 Mapping of sites

Similar to the aerial survey, the site assessment of the project area relied heavily on archive and more recent map renderings of Schoongezicht and Jakhalskraal to assist the challenging foot survey where historical and current maps of the project area were examined. By merging data obtained from the desktop study and the aerial survey, sites and areas of possible heritage potential were plotted on these maps of the larger Waterberg region using GIS software. These maps were then superimposed on high-definition aerial representations in order to graphically demonstrate the geographical locations and distribution of potentially sensitive landscapes.

4.2.4 Field Survey

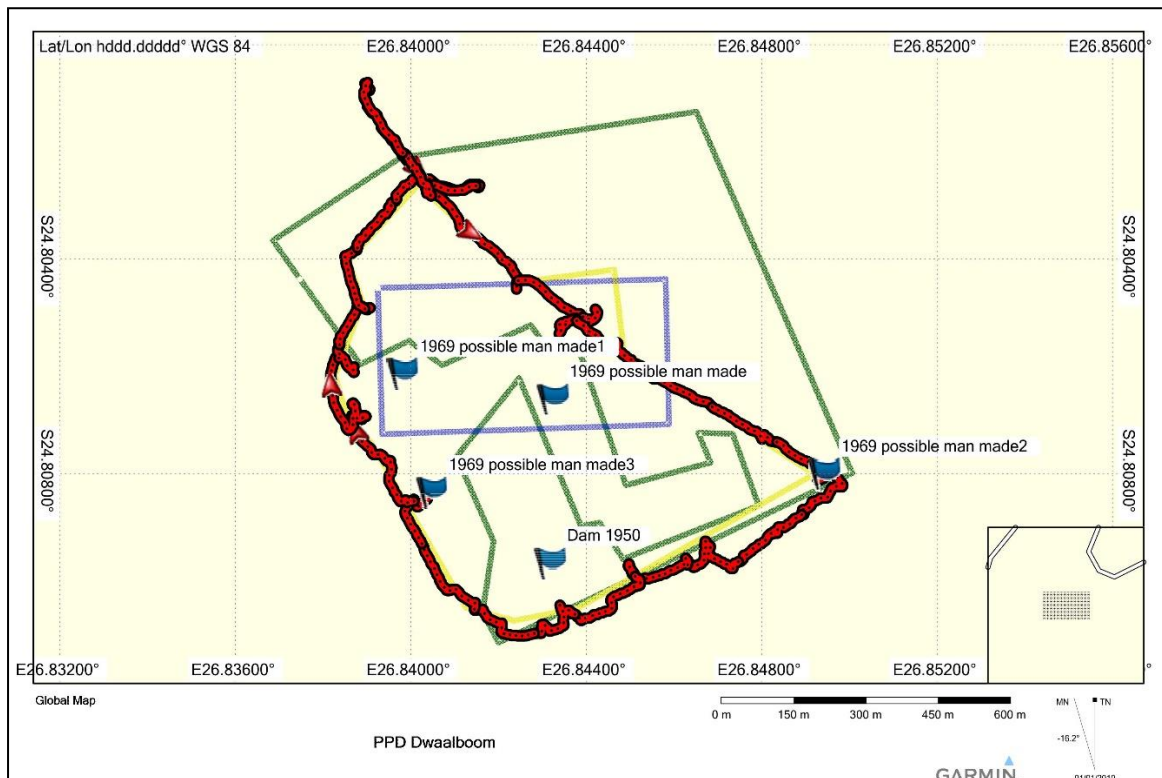


Figure 4-1: Map indicating the GPS Track log for the site survey (red lines). The project footprint (20ha) is indicated by the blue rectangle and disused agricultural fields identified from aerial maps and photographs are indicated by the green polygon. Place markers indicate potential man-made features identified from aerial photos.

Archaeological survey implies the systematic procedure of the identification of archaeological sites. An archaeological survey of the Sturdee Energy PPC Dwaalboom Solar Project area was conducted in February 2021. The process encompassed a random field survey in accordance with standard archaeological practice by which heritage resources are observed and documented. Particular focus was placed on GPS reference points identified during the aerial and mapping survey. Where possible, random spot checks were made and potentially sensitive heritage areas were investigated. Using a Garmin GPS, the survey was tracked and general surroundings were photographed with a Samsung Digital camera. Real time aerial orientation, by means of a mobile Google Earth application was also employed to investigate possible disturbed areas during the survey

4.2.5 General Public Liaison

Consultation with officials from PPC who are familiar with the area in question did not identify any heritage receptors in the project area.

4.3 Limitations and Constraints

The site survey for the Sturdee Energy PPC Dwaalboom Solar Project AIA primarily focused around areas tentatively identified as sensitive and of high heritage probability (i.e. those noted during the mapping and aerial survey) as well as areas of potential high human settlement catchment. In terms of on-site limitations during the survey, the following should be noted:

- The study area is accessed via a mine service road connecting to the regional access road. Access control was arranged for the site assessment. On site, dense vegetation restricted free movement and for the largest part, the site assessment was confined to site service roads, footpaths and transformed and disturbed areas such as the Transnet railway line servitude.
- The surrounding vegetation in the project area mostly comprised out of disused farmlands vegetated by dense pockets of pioneering species, occasional trees and mixed grasslands. The general visibility at the time of the AIA survey (February 2021) was low and the archaeological observations on site was restricted by dense vegetation across most of the project area.

Cognisant of the constraints noted above, it should be stated that the possibility exists that individual sites could be missed due to the localised nature of some heritage remains as well as the possible presence of sub-surface archaeology. Therefore, maintaining due cognisance of the integrity and accuracy of the archaeological survey, it should be stated that the heritage resources identified during the study do not necessarily represent all the heritage resources present in the project area. The subterranean nature of some archaeological sites, dense vegetation cover and visibility constraints sometimes distort heritage representations and any additional heritage resources located during consequent development phases must be reported to the Heritage Resources Authority or an archaeological specialist.



Figure 4-2: View of general surroundings in the project area.



Figure 4-3: View of tall grasses and dense Sickle Bush vegetation in the project area.



Figure 4-4: A section of cleared vegetation and surface grass in the project area.



Figure 4-5: View of dense surface vegetation in the project area.



Figure 4-6: A Transnet railway line forms the southern boundary of the project area.



Figure 4-7: View of the densely vegetated project areas, the PPC Dwaalboom plant is visible in the background.



Figure 4-8: View of tree and grass cover in the project area.



Figure 4-9: View of densely vegetated general surroundings in the project area.



Figure 4-10: View of general surroundings in the project area along an overgrown access road.

4.4 Impact Assessment

For consistency among specialists, impacts were rated and assessed using an Impact and Risk Assessment Methodology provided by CES², for the Scoping Phase of the EIA process in accordance with the requirement of EIA Regulations. Please refer to Section 6 and Addendum 2.

² CES Risk Assessment Methodologies Internal guideline document, 2019

5 RESULTS: AIA & PDA

5.1 Anticipated Paleontology (refer to Fourie 2021 in Addendum 4)

Chemical sediments such as fine-grained limestone and dolomite of the Malmani Subgroup is made up of deposits of organically derived carbonate shells, particles or precipitate. Dolomite is magnesium-rich limestone formed from algal beds and stromatolites. These Early Proterozoic Transvaal stromatolitic dolomites formed and released free oxygen at around 2900 – 2400 Ma. Stromatolites are common in the Malmani dolomites, accepted to be the fossil remnants of the simplest single-celled organisms. They are finely layered, concentric, mound-like structures formed by microscopic algal organisms (Norman and Whitfield 2006). Chert may contain fossils such as echinoids or sponges if nodular, although not common and is rated unlikely.

All of the formations in the development area may contain stromatolites.

Details of the location and distribution of all significant fossil sites or key fossiliferous rock units are often difficult to be determined due to thick topsoil, subsoil, overburden and alluvium. Depth of the overburden may vary a lot.

5.2 Anticipated Archaeology

5.2.1 The Off-Site Desktop Survey

In terms of heritage resources, the general landscape around the project area is primarily well known for its Iron Age Farmer and Colonial / Historical Period archaeology related to farming, rural expansion and warfare of the past century. No particular reference to archaeological sites or features of heritage potential were recorded during an examination of published literature thematically or geographically related to the Schoongezicht and Jakhalskraal properties.

An analysis of historical aerial imagery and archive maps reveals the following (see Figure 5-1 to Figure 5-6):

- The farm Schoongezicht and Jakhalskraal is indicated on an early map of the Transvaal (Jeppe, 1899).
- A number of so-called “huts” and the Schoongezicht and Jakhalskraal farmstead is indicated on a 1967 map and another farmstead, indicated as “Lombard” appears on a 1980 topographic map of Schoongezicht and Jakhalskraal. These maps indicate vast cultivated fields across the property.
- Aerial imagery dating to 1950, 1969 and 1980 indicate that large portions of the Schoongezicht and Jakhalskraal property - and particularly areas subject to this assessment - have been altered extensively by historical farming and agriculture.
- Possible buildings and potential man-made structures appear within the project area on historical aerial imagery (1938 and 1952).
- Historical farming and agriculture lands as well as a wetland / pan are indicated on topographic maps of the project area dating to 1967 and 1984. No buildings and man-made structures appear on these maps within the project area.



Figure 5-1: Aerial images of the project site on Schoongezicht (yellow outline) indicating the presence of extensive agriculture activities (green arrows). Potential man-made structures or features of heritage potential are indicated by orange arrows.

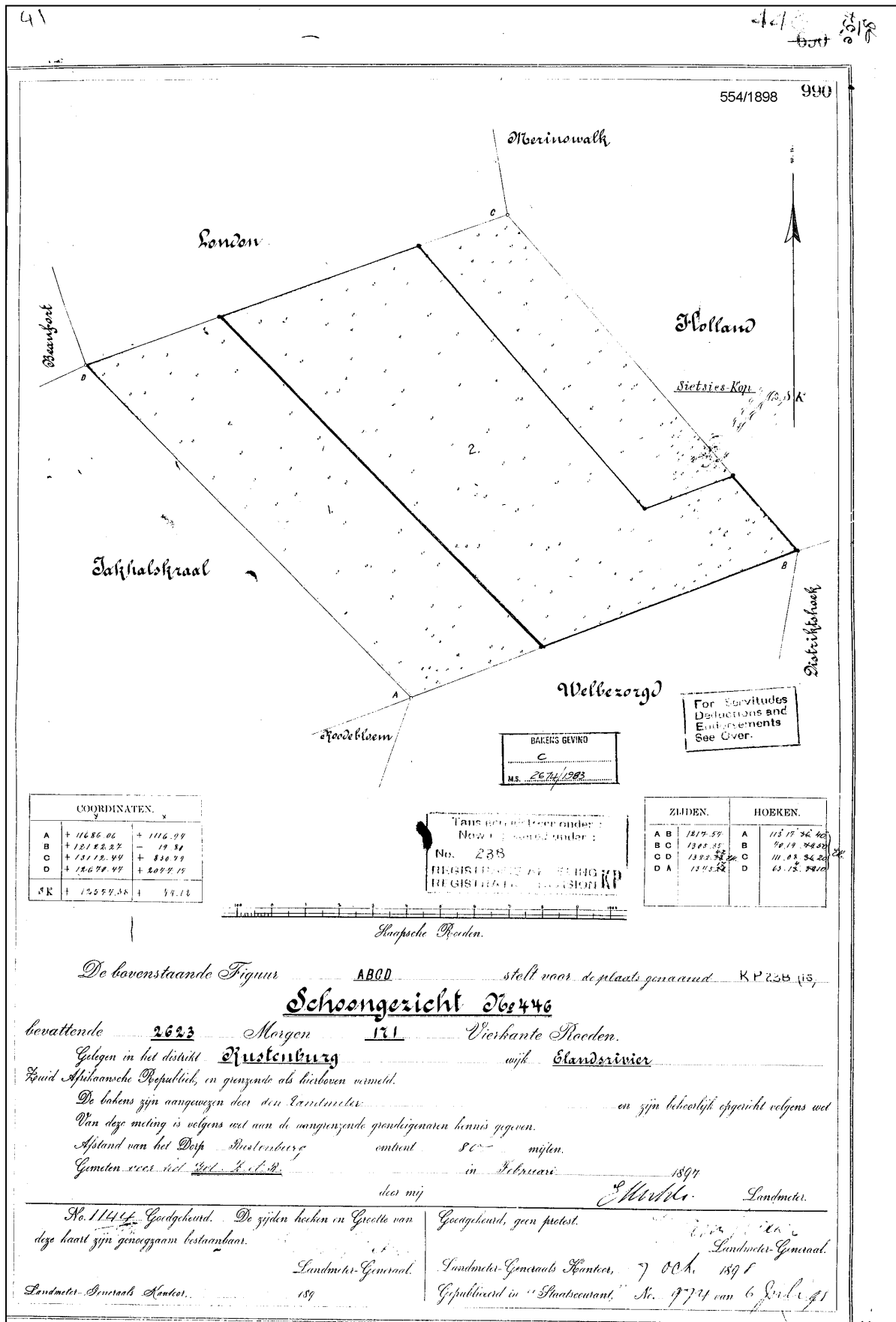


Figure 5-2: The original title deed for the farm Schoongezicht dating to 1897.

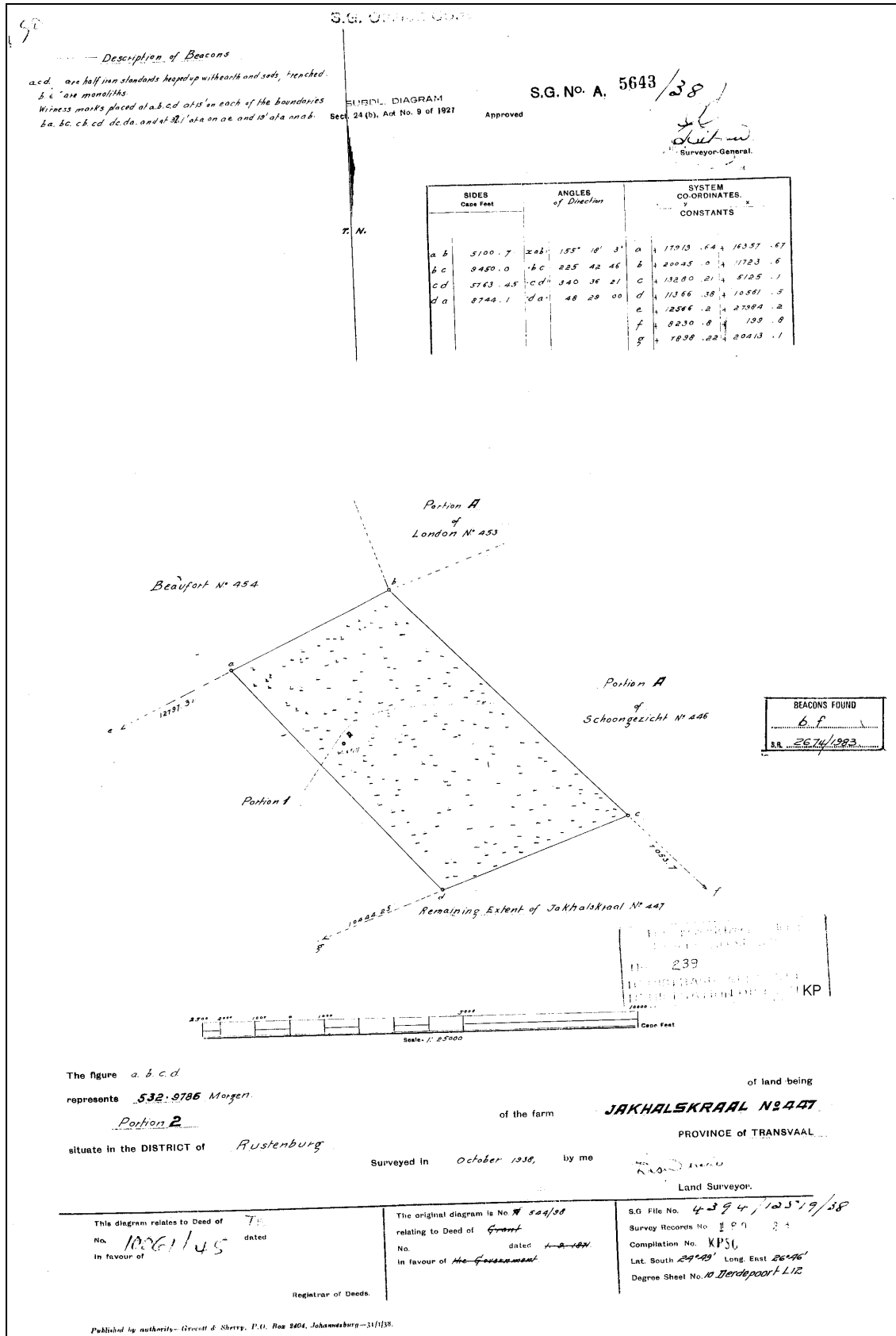


Figure 5-3: A title deed for the farm Jakhalskraal dating to 1938.

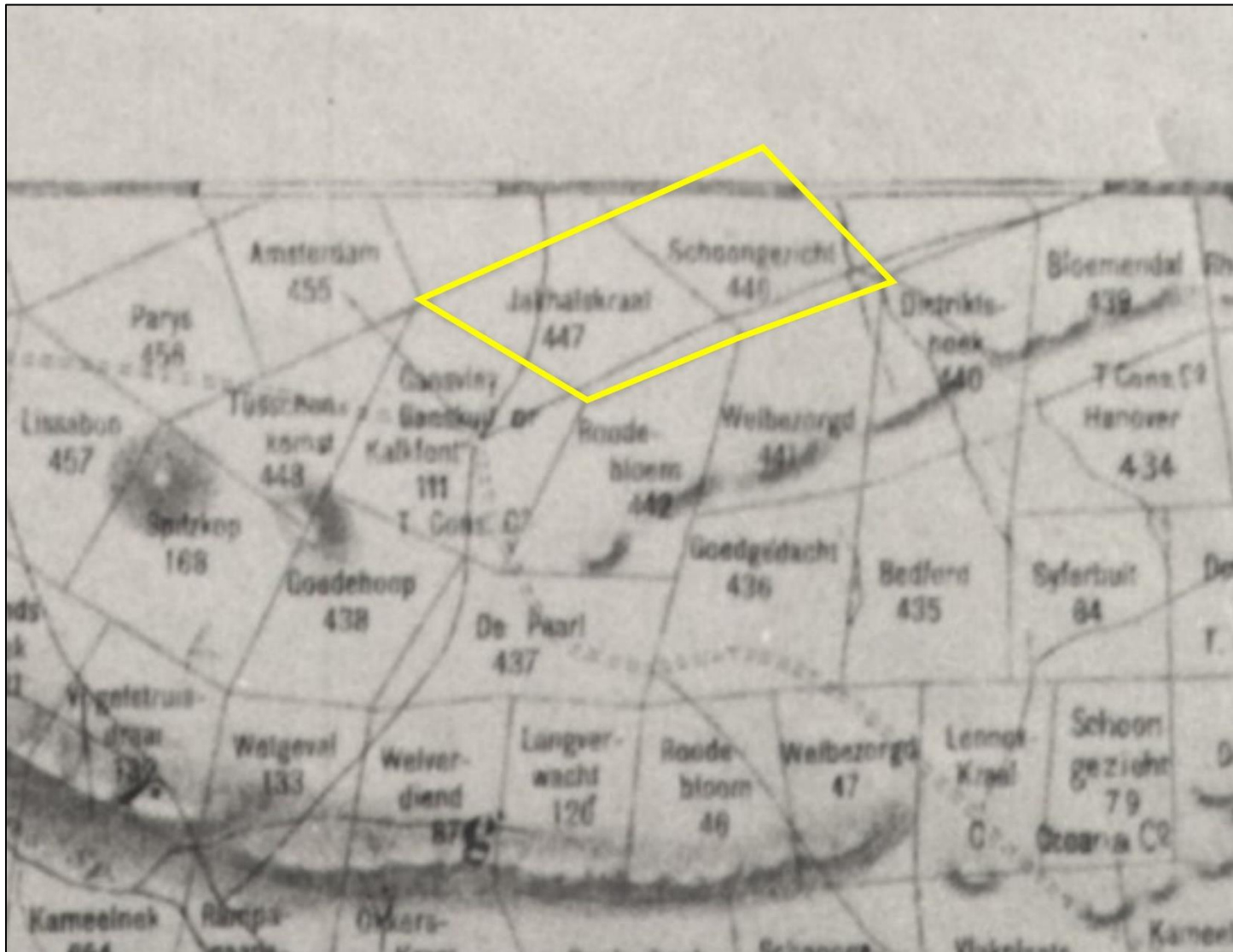


Figure 5-4: Historical map of the western Waterberg region dating to 1899 (Jeppe) indicating the presence of the farm Schoongezicht and Jakhalskraal (yellow outline).

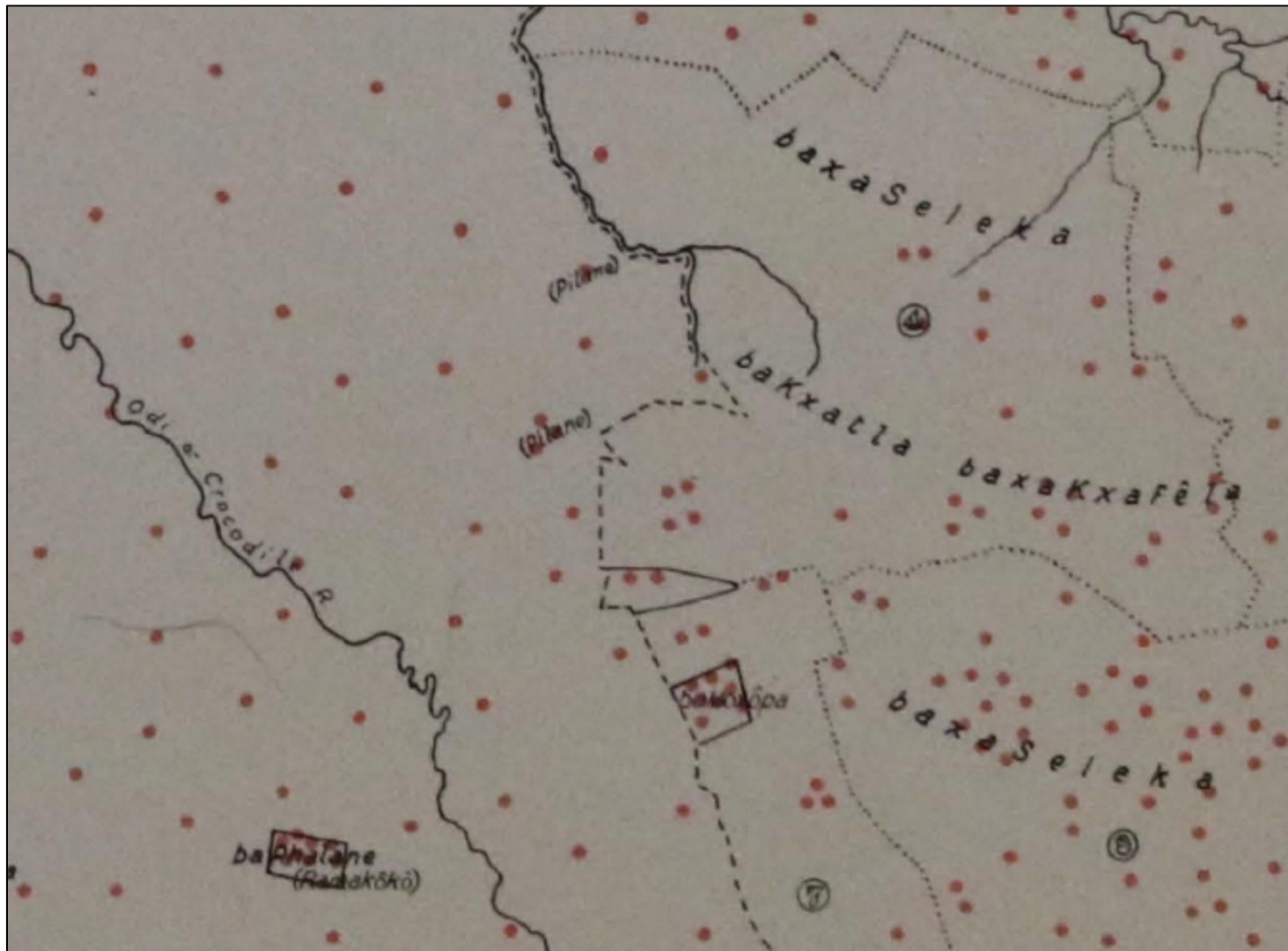


Figure 5-5: An excerpt of Van Warmelo’s Map of the project landscape dating to 1935. Each red dot represents “10 taxpayers”. Note that the project area was relatively sparsely populated by BaSeleka and Bakgatla groups at the time.

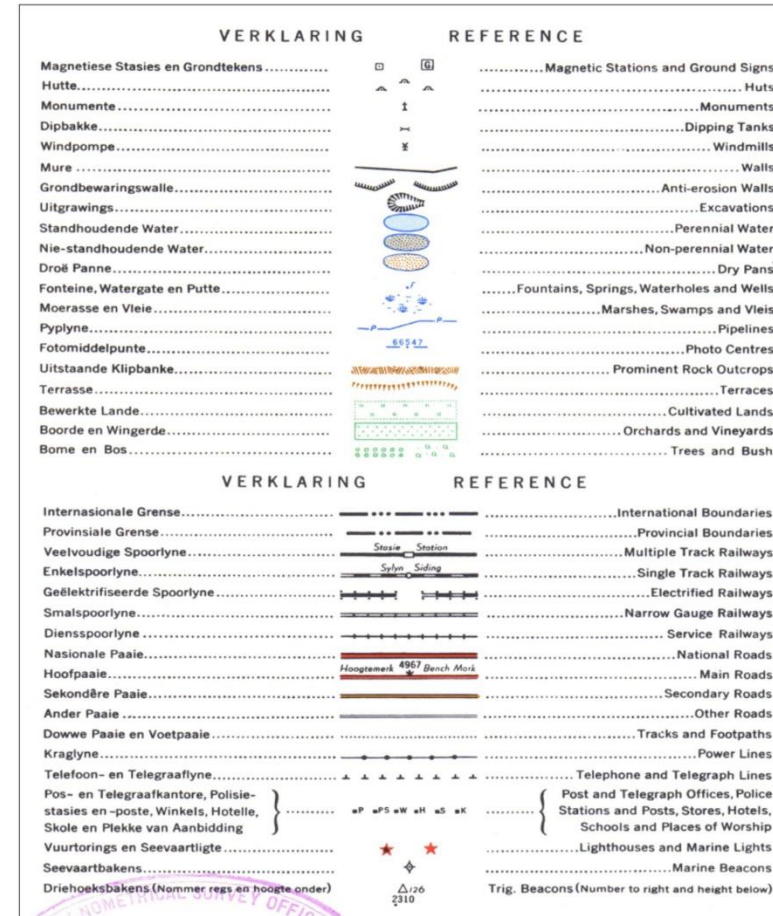
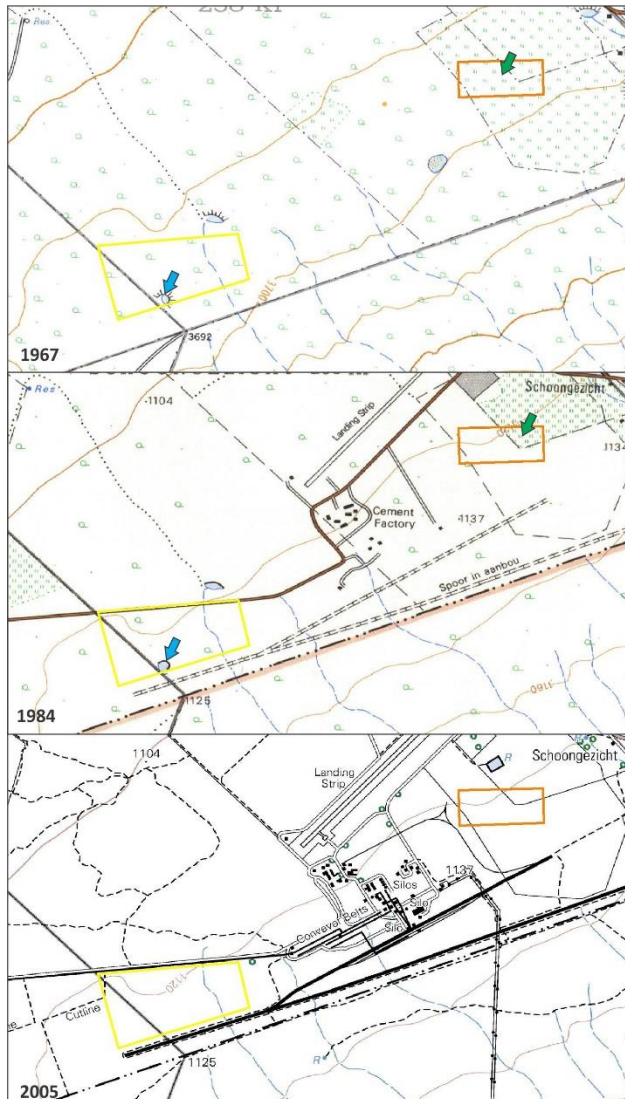


Figure 5-6: Historical topographic maps of Schoongezicht and Jakhalskraal indicating the locations of the preferred development site (orange outlines) as well as the alternative site option (yellow outline) in the past decades. Green arrows point to cultivated lands and the blue arrows indicate a wetland or pan.

5.2.2 The Archaeological Site Survey

An analysis of historical aerial imagery and archive maps of areas subject to this assessment suggests a landscape which has been subjected to historical farming activities possibly sterilising the area of heritage remains. This inference was confirmed during an archaeological site assessment during which no *in situ* heritage remains were encountered. The following observations were made during the site survey:

- **The Stone Age**

Stone Age material generally occurs along drainage lines and exposed surfaces in the landscape. During the site survey no Stone Age occurrences were documented in the proposed development site.

- **The Iron Age Farmer Period**

A frontier zone between the east and the west, the Northern Limpopo landscape holds vast amounts of Iron Age (Farmer period) remnants but no Farmer Period occurrences were noted in the proposed development site.

- **Historical / Colonial Period and recent times**

Thabazimbi and its surroundings have a long and extensive Colonial Period settlement history. From around the first half of the 19th century, the area was frequented by explorers, missionaries and farmers who all contributed to a recent history of contact and conflict. The remnants of recent occupation and mining are scattered across the landscape but no Historical / Colonial Period occurrences were observed in the proposed development site. In terms of the built environment, the project area has no significance, as there are no old buildings, structures, or features, old equipment, public memorial or monuments in the footprint areas.

- **Graves**

No graves of human burial places were noted during the site investigation of the proposed development site. In the rural areas of the Limpopo Province graves and cemeteries often occur within settlements or around homesteads but they are also randomly scattered around archaeological and historical settlements. The probability of informal human burials encountered during development should thus not be excluded. Should any unmarked human burials/remains be found during the course of construction, work in the immediate vicinity should cease and the find must immediately be reported to the archaeologist, or the South African Heritage Resources Agency (SAHRA). Under no circumstances may burials be disturbed or removed until such time as necessary statutory procedures required for grave relocation have been met.

6 RESULTS: STATEMENT OF SIGNIFICANCE AND IMPACT RATING

6.1 Potential Impacts and Significance Ratings³

The following section provides a background to the identification and assessment of possible impacts and alternatives, as well as a range of risk situations and scenarios commonly associated with heritage resources management. A guideline for the rating of impacts and recommendation of management actions for areas of heritage potential within the study area is supplied in Section 10.2 of Addendum 3.

6.2 General assessment of impacts on heritage resources

Generally, the value and significance of archaeological and other heritage sites might be impacted on by any activity that would result immediately or in the future in the destruction, damage, excavation, alteration, removal or collection from its original position, of any archaeological material or object (as indicated in the National Heritage Resources Act (No 25 of 1999)). Thus, the destructive impacts that are possible in terms of heritage resources would tend to be direct, once-off events occurring during the initial construction period. However, in the long run, the proximity of operations in any given area could result in secondary indirect impacts. The EIA process therefore specifies impact assessment criteria which can be utilised from the perspective of a heritage specialist study which elucidates the overall extent of impacts.

6.2.1 Issues Identification Matrix

As noted previously, impacts were rated and assessed using an Impact and Risk Assessment Methodology provided by CES, for the Scoping Phase of the EIA process in accordance with the requirement of EIA Regulations. Please refer to Addendum 2.

The following tables summarize impacts to heritage receptors for the proposed Sturdee Energy PPC Dwaalboom Solar Project.

³ Based on: Winter, S. & Baumann, N. 2005. *Guideline for involving heritage specialists in EIA processes: Edition 1.*

Impact Assessment: Palaeontology

Criteria	Nature	Temporal Scale	Spatial Scale	Severity	Probability	Overall Significance before mitigation	Reversibility	Irreplaceable Loss	Mitigation Potential	Overall Significance after mitigation
Impact 1: Loss of Heritage Resources										
Site Alternative 1	Negative	Short term	Study area	Severe/ Beneficial	Unlikely	LOW	Irreversible	Resource will not be lost	Achievable	LOW
Site Alternative 2	Negative	Short term	Study area	Severe/ Beneficial	Unlikely	LOW	Irreversible	Resource will not be lost	Achievable	LOW

Impact Assessment: Archaeology

Criteria	Nature	Temporal Scale	Spatial Scale	Severity	Probability	Overall Significance before mitigation	Reversibility	Irreplaceable Loss	Mitigation Potential	Overall Significance after mitigation
Impact 1: Loss of Heritage Resources										
Site Alternative 1	Negative	Short term	Study area	Slight	Definite	LOW NEGATIVE	Irreversible	Resource will not be lost	Achievable	LOW NEGATIVE
Site Alternative 2	Negative	Short term	Study area	Slight	Definite	LOW NEGATIVE	Irreversible	Resource will not be lost	Achievable	LOW NEGATIVE

Impact Assessment: Built Environment

Criteria	Nature	Temporal Scale	Spatial Scale	Severity	Probability	Overall Significance before mitigation	Reversibility	Irreplaceable Loss	Mitigation Potential	Overall Significance after mitigation
Impact 1: Loss of Heritage Resources										
Site Alternative 1	Negative	Short term	Study area	Slight	Definite	LOW NEGATIVE	Irreversible	Resource will not be lost	Achievable	LOW NEGATIVE
Site Alternative 2	Negative	Short term	Study area	Slight	Definite	LOW NEGATIVE	Irreversible	Resource will not be lost	Achievable	LOW NEGATIVE

Impact Assessment: Cultural Landscape

Criteria	Nature	Temporal Scale	Spatial Scale	Severity	Probability	Overall Significance before mitigation	Reversibility	Irreplaceable Loss	Mitigation Potential	Overall Significance after mitigation
Impact 1: Loss of Heritage Resources										
Site Alternative 1	Negative	Short term	Study area	Slight	Definite	LOW NEGATIVE	Irreversible	Resource will not be lost	Achievable	LOW NEGATIVE
Site Alternative 2	Negative	Short term	Study area	Slight	Definite	LOW NEGATIVE	Irreversible	Resource will not be lost	Achievable	LOW NEGATIVE

Impact Assessment: Human Burial Sites

Criteria	Nature	Temporal Scale	Spatial Scale	Severity	Probability	Overall Significance before mitigation	Reversibility	Irreplaceable Loss	Mitigation Potential	Overall Significance after mitigation
Impact 1: Loss of Heritage Resources										
Site Alternative 1	Negative	Short term	Study area	Slight	Definite	LOW NEGATIVE	Irreversible	Resource will not be lost	Achievable	LOW NEGATIVE
Site Alternative 2	Negative	Short term	Study area	Slight	Definite	LOW NEGATIVE	Irreversible	Resource will not be lost	Achievable	LOW NEGATIVE

Previous studies conducted in the Western Limpopo Province and the Waterberg suggest a rich and diverse archaeological landscape. Generally, the area is highly suitable for pre-colonial habitation and, even though the project area contains no visible tangible heritage remains, the probability of exposing archaeological remains that might be present in surface and sub-surface deposits along drainage lines and in pristine areas during development should not be excluded.

6.2.2 Palaeontology (Fourie 2021)

Part of the development footprint is situated on the Malmani Subgroup with a high palaeontological sensitivity. The Nature of the impact is the destruction of Fossil Heritage. Loss of fossil heritage will have a negative impact. The probability of the impact occurring is improbable. The expected duration of the impact is assessed as potentially permanent. Only the site will be affected. In the absence of mitigation procedures (should fossil material be present within the affected area) the damage or destruction of any palaeontological materials will be permanent. The loss of resources occurs but natural cultural and social processes continue, albeit in a modified manner. With Mitigation the impact will be low and the cumulative impact is low. Impacts on palaeontological heritage during the construction and preconstruction phase could potentially occur but are regarded as having a low/minor possibility. The significance of the impact occurring will be low.

6.2.3 Archaeology

The study did not identify any archaeological receptors which will be directly impacted by the proposed project and no impact on archaeological sites or features is anticipated.

6.2.4 Built Environment

The study identified no buildings or structures of historical or heritage significance. For the rest of the project area, the general landscape holds varied significance in terms of the built environment as the area comprises historical farming remnants and relatively newly established industrial zones, settlements and townlands. However, no impact on built environment sites is anticipated.

6.2.5 Cultural Landscape

Generally, the proposed project area and its surrounds are characterised by open fields and farmlands. Further away from the project area, the landscape is typical of the rural north Limpopo with undulating hills with flatter plains in-between. This landscape stretches over many kilometres and the proposed project is unlikely to result in a significant impact on the landscape.

6.2.6 Graves / Human Burials Sites

No human burials were documented in the project area and no impact on human remains is foreseen. In the rural areas of the Limpopo Province graves and cemeteries sometimes occur within settlements or around homesteads but they are also randomly scattered around archaeological and historical settlements. The probability of additional and informal human burials encountered during development should thus not be excluded. In addition, human remains and burials are commonly found close to archaeological sites; they may be found in "lost" graveyards, or occur sporadically anywhere as a result of prehistoric activity, victims of conflict or crime. It is often difficult to detect the presence of archaeological human remains on the landscape as these burials, in most cases, are not marked at the surface.

Human remains are usually observed when they are exposed through erosion. In some instances packed stones or rocks may indicate the presence of informal pre-colonial burials. If any human bones are found during the course of construction work then they should be reported to an archaeologist and work in the

immediate vicinity should cease until the appropriate actions have been carried out by the archaeologist. Where human remains are part of a burial they would need to be exhumed under a permit from SAHRA (for pre-colonial burials as well as burials later than about AD 1500). Should any unmarked human burials/remains be found during the course of construction, work in the immediate vicinity should cease and the find must immediately be reported to the archaeologist, or the South African Heritage Resources Agency (SAHRA). Under no circumstances may burials be disturbed or removed until such time as necessary statutory procedures required for grave relocation have been met.

6.3 Management actions

Recommendations for relevant heritage resource management actions are vital to the conservation of heritage resources. A general guideline for recommended management actions is included in Section 10.4 of Addendum 3.

OBJECTIVE: ensure conservation of heritage resources of significance, prevent unnecessary disturbance and/or destruction of previously undetected heritage receptors.

6.3.1 Palaeontology (refer to Fourie 2021 in Addendum 4)

There is no objection to the development, it may be necessary to request a Phase 1 Palaeontological Impact Assessment: Field study to determine whether the development will affect fossiliferous outcrops as the palaeontological sensitivity is **HIGH** with a Phase 2 Palaeontological Mitigation is when a Phase 1 Palaeontological Assessment identified a fossiliferous formation or surface fossils, or if fossils are found during clearing, construction excavations, drilling and blasting. The following recommendations are made in terms of palaeontology:

- Special care must be taken during the digging, drilling, blasting and excavating of foundations, trenches, channels and footings and removal of overburden. An appropriate Protocol and Management plan is attached for the Environmental Control Officer in the PDA.
- Mitigation may be needed if fossils (stromatolites) are found.
- The Environmental Control Officer must familiarise him- or herself with the formations present and its fossils.
- The development may go ahead, but the ECO must survey for fossils before and or after clearing, blasting, drilling or excavating.
- The EMPr already covers the conservation of heritage and palaeontological material that may be exposed during construction activities. For a chance find, the protocol is to immediately cease all construction activities, construct a 30 m no-go barrier, and contact SAHRA for further investigation.
- Care must be taken during the dolomite risk assessment as stromatolites may be present (according SANS 1936-1 (2012)) not to destroy any stromatolites.

6.3.2 Archaeology

No specific mitigation measures in terms of further heritage resources management are required for the Sturdee Energy PPC Dwaalboom Solar Project. However, the following general recommendations should be considered:

PROJECT COMPONENT/S	All phases of construction and operation.
POTENTIAL IMPACT	Damage/destruction of sites.
ACTIVITY RISK/SOURCE	Digging foundations and trenches into sensitive deposits that are not visible at the surface.
MITIGATION:	To locate previously undetected heritage remains / graves as soon as

TARGET/OBJECTIVE	possible after disturbance so as to maximize the chances of successful rescue/mitigation work.		
MITIGATION: ACTION/CONTROL	RESPONSIBILITY	TIMEFRAME	
Fixed Mitigation Procedure (required)			
<p>Short-term Site Monitoring: Monitoring of site clearing and earth moving during initial stages of the development to detect the presence of possible heritage resources in the project area.</p> <p>General Site Monitoring: Regular examination of trenches and excavations for the total duration of construction.</p>	ECO	Monitor as frequently as practically possible.	
PERFORMANCE INDICATOR	Archaeological sites are discovered and mitigated with the minimum amount of unnecessary disturbance.		
MONITORING	Successful location of sites by person/s monitoring.		

7 RECOMMENDATIONS

The larger landscape around the project area indicates a rich heritage horizon encompassing Iron Age Farmer and Colonial / Historical Period archaeology primarily related to farming, rural expansion and warfare of the past century. Locally, the project area has seen vast transformation by agriculture activities potentially sterilising surface and subsurface of heritage remains, especially those dating to pre-colonial and prehistorical times. Cognisance should nonetheless be taken of archaeological material that might be present in surface and sub-surface deposits along drainage lines and in pristine areas.

In terms of palaeontology, it was established that part of the development footprint is situated on the Malmani Subgroup with a high palaeontological sensitivity. Threats to the National Heritage are earth moving equipment/machinery (for example haul trucks, front end loaders, excavators, graders, dozers) during construction, the sealing-in or destruction of the fossils by development, vehicle traffic, and human disturbance. The Nature of the impact is the destruction of Fossil Heritage. Loss of fossil heritage will have a negative impact. The probability of the impact occurring is improbable. The expected duration of the impact is assessed as potentially permanent. Only the site will be affected. In the absence of mitigation procedures (should fossil material be present within the affected area) the damage or destruction of any palaeontological materials will be permanent. The loss of resources occurs but natural cultural and social processes continue, albeit in a modified manner. With Mitigation the impact will be low and the cumulative impact is low. Impacts on palaeontological heritage during the construction and preconstruction phase could potentially occur but are regarded as having a low/minor possibility. The significance of the impact occurring will be low. The following recommendations are made in terms of palaeontology:

- Special care must be taken during the digging, drilling, blasting and excavating of foundations, trenches, channels and footings and removal of overburden. An appropriate Protocol and Management plan is attached for the Environmental Control Officer in the PDA.
- Mitigation may be needed if fossils (stromatolites) are found.
- The Environmental Control Officer must familiarise him- or herself with the formations present and its fossils.
- The development may go ahead, but the ECO must survey for fossils before and or after clearing, blasting, drilling or excavating.
- The EMPr already covers the conservation of heritage and palaeontological material that may be exposed during construction activities. For a chance find, the protocol is to immediately cease all construction activities, construct a 30 m no-go barrier, and contact SAHRA for further investigation.
- Care must be taken during the dolomite risk assessment as stromatolites may be present (according SANS 1936-1 (2012)) not to destroy any stromatolites.

In terms of archaeology, it has been noted that the proposed project area has seen significant transformation as a result of historical and recent agricultural practices risking the sterilization of these zones of heritage remains. During the survey, **no heritage receptors were noted** and it might be assumed that development at the preferred site will result in a minimal (if any) impact on heritage resources. The following general recommendations are made based on general observations at the site;

- The site survey for the Sturdee Energy PPC Dwaalboom Solar Project AIA proved to be constrained by dense and often impenetrable vegetation which restricted free movement and obstructed surface visibility. Findings from the desktop assessment, indicating a sparse human settlement pattern and significant agriculture development during the last century, suggest a low heritage potential for the project area. However, the possibility that undetected heritage receptors might be present in the project footprint should not be excluded and the close and

frequent monitoring of the initial stages of the project (vegetation clearing, earth moving and excavations) by an informed Environmental Control Officer (ECO) is recommended. Should any subsurface palaeontological, archaeological or historical material, or burials be exposed during construction activities, all activities should be suspended and the archaeological specialist should be notified immediately.

- It should be stated that it is likely that further undetected archaeological remains might occur elsewhere in the project landscape along water sources and drainage lines, fountains and pans would often have attracted human activity in the past. Also, since Stone Age material seems to originate from below present soil surfaces in eroded areas, the larger landscape should be regarded as potentially sensitive in terms of possible subsurface deposits. Burials and historically significant structures dating to the Colonial Period occur on farms in the area and these resources should be avoided during all phases of construction and development, including the operational phases of the development.

In addition to these site-specific recommendations, careful cognizance should be taken of the following:

- As Palaeontological remains occur where bedrock has been exposed, all geological features should be regarded as sensitive.
- Water sources such as drainage lines, fountains and pans would often have attracted human activity in the past. As Stone Age material occur in the larger landscape, such resources should be regarded as potentially sensitive in terms of possible subsurface deposits.

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9 ADDENDUM 1: HERITAGE LEGISLATION BACKGROUND

9.1 CRM: Legislation, Conservation and Heritage Management

The broad generic term Cultural Heritage Resources refers to any physical and spiritual property associated with past and present human use or occupation of the environment, cultural activities and history. The term includes sites, structures, places, natural features and material of palaeontological, archaeological, historical, aesthetic, scientific, architectural, religious, symbolic or traditional importance to specific individuals or groups, traditional systems of cultural practice, belief or social interaction.

9.1.1 Legislation regarding archaeology and heritage sites

The South African Heritage Resources Agency (SAHRA) and their provincial offices aim to conserve and control the management, research, alteration and destruction of cultural resources of South Africa. It is therefore vitally important to adhere to heritage resource legislation at all times.

d. National Heritage Resources Act No 25 of 1999, section 35

According to the National Heritage Resources Act of 1999 a historical site is any identifiable building or part thereof, marker, milestone, gravestone, landmark or tell older than 60 years. This clause is commonly known as the "60-years clause". Buildings are amongst the most enduring features of human occupation, and this definition therefore includes all buildings older than 60 years, modern architecture as well as ruins, fortifications and Iron Age settlements. "Tell" refers to the evidence of human existence which is no longer above ground level, such as building foundations and buried remains of settlements (including artefacts).

The Act identifies heritage objects as:

- objects recovered from the soil or waters of South Africa including archaeological and palaeontological objects, meteorites and rare geological specimens
- visual art objects
- military objects
- numismatic objects
- objects of cultural and historical significance
- objects to which oral traditions are attached and which are associated with living heritage
- objects of scientific or technological interest
- any other prescribed category

With regards to activities and work on archaeological and heritage sites this Act states that:

"No person may alter or demolish any structure or part of a structure which is older than 60 years without a permit by the relevant provincial heritage resources authority." (34. [1] 1999:58)

and

"No person may, without a permit issued by the responsible heritage resources authority-

- (d) destroy, damage, excavate, alter, deface or otherwise disturb any archaeological or palaeontological site or any meteorite;*
- (e) destroy, damage, excavate, remove from its original position, collect or own any archaeological or palaeontological material or object or any meteorite;*

- (f) *trade in, sell for private gain, export or attempt to export from the Republic any category of archaeological or palaeontological material or object, or any meteorite; or*
- (g) *bring onto or use at an archaeological or palaeontological site any excavation equipment or any equipment which assist in the detection or recovery of metals or archaeological and palaeontological material or objects, or use such equipment for the recovery of meteorites. (35. [4] 1999:58)."*

and

"No person may, without a permit issued by SAHRA or a provincial heritage resources agency-

- (h) *destroy, damage, alter, exhume or remove from its original position or otherwise disturb the grave of a victim of conflict, or any burial ground or part thereof which contains such graves;*
- (i) *destroy, damage, alter, exhume, remove from its original position or otherwise disturb any grave or burial ground older than 60 years which is situated outside a formal cemetery administered by a local authority;*
- (j) *bring onto or use at a burial ground or grave referred to in paragraph (a) or (b) and excavation equipment, or any equipment which assists in the detection or recovery of metals (36. [3] 1999:60)."*

e. Human Tissue Act of 1983 and Ordinance on the Removal of Graves and Dead Bodies of 1925

Graves 60 years or older are heritage resources and fall under the jurisdiction of both the National Heritage Resources Act and the Human Tissues Act of 1983. However, graves younger than 60 years are specifically protected by the Human Tissues Act (Act 65 of 1983) and the Ordinance on the Removal of Graves and Dead Bodies (Ordinance 7 of 1925) as well as any local and regional provisions, laws and by-laws. Such burial places also fall under the jurisdiction of the National Department of Health and the Provincial Health Departments. Approval for the exhumation and re-burial must be obtained from the relevant Provincial MEC as well as the relevant Local Authorities.

9.1.2 Background to HIA and AIA Studies

South Africa's unique and non-renewable archaeological and palaeontological heritage sites are 'generally' protected in terms of the National Heritage Resources Act (Act No 25 of 1999, section 35) and may not be disturbed at all without a permit from the relevant heritage resources authority. Heritage sites are frequently threatened by development projects and both the environmental and heritage legislation require impact assessments (HIAs & AIAs) that identify all heritage resources in areas to be developed. Particularly, these assessments are required to make recommendations for protection or mitigation of the impact of the sites. HIAs and AIAs should be done by qualified professionals with adequate knowledge to (a) identify all heritage resources including archaeological and palaeontological sites that might occur in areas of developed and (b) make recommendations for protection or mitigation of the impact on the sites.

The National Heritage Resources Act (Act No. 25 of 1999, section 38) provides guidelines for Cultural Resources Management and prospective developments:

"38. (1) Subject to the provisions of subsections (7), (8) and (9), any person who intends to undertake a

development categorised as:

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

must at the very earliest stages of initiating such a development, notify the responsible heritage resources authority and furnish it with details regarding the location, nature and extent of the proposed development."

And:

"The responsible heritage resources authority must specify the information to be provided in a report required in terms of subsection (2)(a): Provided that the following must be included:

- (k) *The identification and mapping of all heritage resources in the area affected;*
- (l) *an assessment of the significance of such resources in terms of the heritage assessment criteria set out in section 6(2) or prescribed under section 7;*
- (m) *an assessment of the impact of the development on such heritage resources;*
- (n) *an evaluation of the impact of the development on heritage resources relative to the sustainable social and economic benefits to be derived from the development;*
- (o) *the results of consultation with communities affected by the proposed development and other interested parties regarding the impact of the development on heritage resources;*
- (p) *if heritage resources will be adversely affected by the proposed development, the consideration of alternatives; and*
- (q) *plans for mitigation of any adverse effects during and after the completion of the proposed development (38. [3] 1999:64)."*

Consequently, section 35 of the Act requires Heritage Impact Assessments (HIAs) or Archaeological Impact Assessments (AIAs) to be done for such developments in order for all heritage resources, that is, all places or objects of aesthetics, architectural, historic, scientific, social, spiritual, linguistic or technological value or significance to be protected. Thus any assessment should make provision for the protection of all these heritage components, including archaeology, shipwrecks, battlefields, graves, and structures older than 60

years, living heritage, historical settlements, landscapes, geological sites, palaeontological sites and objects. Heritage resources management and conservation.

9.2 Assessing the Significance of Heritage Resources

Archaeological sites, as previously defined in the National Heritage Resources Act (Act 25 of 1999) are places in the landscape where people have lived in the past – generally more than 60 years ago – and have left traces of their presence behind. In South Africa, archaeological sites include hominid fossil sites, places where people of the Earlier, Middle and Later Stone Age lived in open sites, river gravels, rock shelters and caves, Iron Age sites, graves, and a variety of historical sites and structures in rural areas, towns and cities. Palaeontological sites are those with fossil remains of plants and animals where people were not involved in the accumulation of the deposits. The basic principle of cultural heritage conservation is that archaeological and other heritage sites are valuable, scarce and *non-renewable*. Many such sites are unfortunately lost on a daily basis through development for housing, roads and infrastructure and once archaeological sites are damaged, they cannot be re-created as site integrity and authenticity is permanently lost. Archaeological sites have the potential to contribute to our understanding of the history of the region and of our country and continent. By preserving links with our past, we may not be able to revive lost cultural traditions, but it enables us to appreciate the role they have played in the history of our country.

- Categories of significance

Rating the significance of archaeological sites, and consequently grading the potential impact on the resources is linked to the significance of the site itself. The significance of an archaeological site is based on the amount of deposit, the integrity of the context, the kind of deposit and the potential to help answer present research questions. Historical structures are defined by Section 34 of the National Heritage Resources Act, 1999, while other historical and cultural significant sites, places and features, are generally determined by community preferences. The guidelines as provided by the NHRA (Act No. 25 of 1999) in Section 3, with special reference to subsection 3 are used when determining the cultural significance or other special value of archaeological or historical sites. In addition, ICOMOS (the Australian Committee of the International Council on Monuments and Sites) highlights four cultural attributes, which are valuable to any given culture:

- *Aesthetic value:*

Aesthetic value includes aspects of sensory perception for which criteria can and should be stated. Such criteria include consideration of the form, scale, colour, texture and material of the fabric, the general atmosphere associated with the place and its uses and also the aesthetic values commonly assessed in the analysis of landscapes and townscape.

- *Historic value:*

Historic value encompasses the history of aesthetics, science and society and therefore to a large extent underlies all of the attributes discussed here. Usually a place has historical value because of some kind of influence by an event, person, phase or activity.

- *Scientific value:*

The scientific or research value of a place will depend upon the importance of the data involved, on its rarity, quality and on the degree to which the place may contribute further substantial information.

- *Social value:*

Social value includes the qualities for which a place has become a focus of spiritual, political, national or other cultural sentiment to a certain group.

It is important for heritage specialist input in the EIA process to take into account the heritage management structure set up by the NHR Act. It makes provision for a 3-tier system of management including the South Africa Heritage Resources Agency (SAHRA) at a national level, Provincial Heritage Resources Authorities (PHRAs) at a provincial and the local authority. The Act makes provision for two types or forms of protection of heritage resources; i.e. formally protected and generally protected sites:

Formally protected sites:

- Grade 1 or national heritage sites, which are managed by SAHRA
- Grade 2 or provincial heritage sites, which are managed by the provincial HRA (MP-PHRA).
- Grade 3 or local heritage sites.

Generally protected sites:

- Human burials older than 60 years.
- Archaeological and palaeontological sites.
- Shipwrecks and associated remains older than 60 years.
- Structures older than 60 years.

With reference to the evaluation of sites, the certainty of prediction is definite, unless stated otherwise and if the significance of the site is rated high, the significance of the impact will also result in a high rating. The same rule applies if the significance rating of the site is low. The significance of archaeological sites is generally ranked into the following categories.

Significance	Rating Action
No significance: sites that do not require mitigation.	None
Low significance: sites, which may require mitigation.	2a. Recording and documentation (Phase 1) of site; no further action required 2b. Controlled sampling (shovel test pits, auguring), mapping and documentation (Phase 2 investigation); permit required for sampling and destruction
Medium significance: sites, which require mitigation.	3. Excavation of representative sample, C14 dating, mapping and documentation (Phase 2 investigation); permit required for sampling and destruction [including 2a & 2b]
High significance: sites, where disturbance should be avoided.	4a. Nomination for listing on Heritage Register (National, Provincial or Local) (Phase 2 & 3 investigation); site management plan; permit required if utilised for education or tourism
High significance: Graves and burial places	4b. Locate demonstrable descendants through social consulting; obtain permits from applicable legislation, ordinances and regional by-laws; exhumation and reinterment [including 2a, 2b & 3]

Furthermore, the significance of archaeological sites was based on six main criteria:

- Site integrity (i.e. primary vs. secondary context),
- Amount of deposit, range of features (e.g., stonewalling, stone tools and enclosures),
- Density of scatter (dispersed scatter),
- Social value,
- Uniqueness, and
- Potential to answer current and future research questions.

10 ADDENDUM 2: IMPACT ASSESSMENT METHODOLOGY

10.1.1 Issues Identification Matrix

impacts were rated and assessed using an Impact and Risk Assessment Methodology provided by CES, for the Scoping Phase of the EIA process in accordance with the requirement of EIA Regulations. Here, two parameters and five factors are considered when assessing the significance of the identified issues, and each is scored. **Significance** is achieved by ranking the five criteria presented in Table 1 below, to determine the overall significance of an issue. The ranking for the “effect” (which includes scores for duration; extent; consequence and probability) and reversibility / mitigation are then read off the matrix presented in Table 2 below, to determine the overall significance of the issue. The overall significance is either negative or positive.

- **Duration** - The temporal scale defines the significance of the impact at various time scales, as an indication of the duration of the impact.

- **Extent** - The spatial scale defines the physical extent of the impact.

- **Consequence** - The consequence scale is used in order to, as far as possible, objectively evaluate how severe a number of negative impacts associated with the issue under consideration might be, or how beneficial a number of positive impacts associated with the issue under consideration might be.

- The **probability** of the impact occurring - The likelihood of impacts taking place as a result of project actions arising from the various alternatives. There is no doubt that some impacts would occur (e.g. loss of vegetation), but other impacts are not as likely to occur (e.g. vehicle accident), and may or may not result from the proposed development and alternatives. Although some impacts may have a severe effect, the likelihood of them occurring may affect their overall significance.

- **Reversibility / Mitigation** – The degree of difficulty of reversing and/or mitigating the various impacts ranges from easily achievable to very difficult. The four categories used are listed and explained in Table 1 below. Both the practical feasibility of the measure, the potential cost and the potential effectiveness is taken into consideration when determining the appropriate degree of difficulty.

10.1.2 Assessing Impacts

The CES rating scale used in this assessment takes into consideration the following criteria, and includes the new criteria for assessing post mitigation significance (residual impacts), by incorporating the principles of reversibility and irreplaceability:

- **Nature of impact** (Negative or positive impact on the environment).
- **Type of impact** (Direct, indirect and/or cumulative effect of impact on the environment).
- **Duration, Extent, Probability** (see Table below)

Duration (Temporal Scale)		Score
Short term	Less than 5 years	1
Medium term	Between 5-20 years	2
Long term	Between 20 and 40 years (a generation) and from a human perspective also permanent	3
Permanent	Over 40 years and resulting in a permanent and lasting change that will always be there	4
Extent (Spatial Scale)		
Localised	At localised scale and a few hectares in extent	1
Study Area	The proposed site and its immediate environs	2
Regional	District and Provincial level	3
National	Country	3
International	Internationally	4
Probability (Likelihood)		
Unlikely	The likelihood of these impacts occurring is slight	1
May Occur	The likelihood of these impacts occurring is possible	2
Probable	The likelihood of these impacts occurring is probable	3
Definite	The likelihood is that this impact will definitely occur	4

- Severity or benefits

Impact Severity		Score
<i>(The severity of negative impacts, or how beneficial positive impacts would be on a particular affected system or affected party)</i>		
Very severe	Very beneficial	4
An irreversible and permanent change to the affected system(s) or party(ies) which cannot be mitigated. For example the permanent loss of land.	A permanent and very substantial benefit to the affected system(s) or party(ies), with no real alternative to achieving this benefit. For example the vast improvement of sewage effluent quality.	
Severe	Beneficial	3
Long term impacts on the affected system(s) or party(ies) that could be mitigated. However, this mitigation would be difficult, expensive or time consuming, or some combination of these. For example, the clearing of forest vegetation.	A long term impact and substantial benefit to the affected system(s) or party(ies). Alternative ways of achieving this benefit would be difficult, expensive or time consuming, or some combination of these. For example an increase in the local economy.	
Moderately severe	Moderately beneficial	2
Medium to long term impacts on the affected system(s) or party (ies), which could be mitigated. For example constructing the sewage treatment facility where there was vegetation with a low conservation value.	A medium to long term impact of real benefit to the affected system(s) or party(ies). Other ways of optimising the beneficial effects are equally difficult, expensive and time consuming (or some combination of these), as achieving them in this way. For example a 'slight' improvement in sewage effluent quality.	
Slight	Slightly beneficial	1
Medium or short term impacts on the affected system(s) or party(ies). Mitigation is very easy, cheap, less time consuming or not necessary. For example a temporary fluctuation in the water table due to water abstraction.	A short to medium term impact and negligible benefit to the affected system(s) or party(ies). Other ways of optimising the beneficial effects are easier, cheaper and quicker, or some combination of these.	
No effect	Don't know/Can't know	
The system(s) or party(ies) is not affected by the proposed development.	In certain cases it may not be possible to determine the severity of an impact.	

* In certain cases it may not be possible to determine the severity of an impact thus it may be determined: Don't know/Can't know

The scores for the three criteria in the Tables above are added to obtain a composite score. They must then be considered against the severity rating to determine the overall significance of an activity. This is because the severity of the impact is far more important than the other three criteria. The overall significance is then obtained by reading off the matrix presented in the table below. The overall significance is either negative or positive (Criterion 1) and direct, indirect or cumulative (Criterion 2).

SEVERITY	COMPOSITE DURATION, EXTENT & PROBABILITY SCORE										
	3	4	5	6	7	8	9	10	11	12	
Slight	3	4	5	6	7	8	9	10	11	12	
Mod severe	3	4	5	6	7	8	9	10	11	12	
Severe	3	4	5	6	7	8	9	10	11	12	
Very severe	3	4	5	6	7	8	9	10	11	12	

The **environmental significance** scale is an attempt to evaluate the importance of a particular impact. This evaluation needs to be undertaken in the relevant context, as an impact can either be ecological or social, or both. The evaluation of the significance of an impact relies heavily on the values of the person making the judgment. For this reason, impacts of especially a social nature need to reflect the values of the affected society.

OVERALL SIGNIFICANCE <i>(The combination of all the above criteria as an overall significance)</i>	
VERY HIGH NEGATIVE	VERY BENEFICIAL
<p>These impacts would be considered by society as constituting a major and usually permanent change to the (natural and/or social) environment, and usually result in severe or very severe effects, or beneficial or very beneficial effects.</p> <p><i>Example: The loss of a species would be viewed by informed society as being of VERY HIGH significance.</i></p> <p><i>Example: The establishment of a large amount of infrastructure in a rural area, which previously had very few services, would be regarded by the affected parties as resulting in benefits with VERY HIGH significance.</i></p>	
HIGH NEGATIVE	BENEFICIAL
<p>These impacts will usually result in long term effects on the social and/or natural environment. Impacts rated as HIGH will need to be considered by society as constituting an important and usually long term change to the (natural and/or social) environment. Society would probably view these impacts in a serious light.</p> <p><i>Example: The loss of a diverse vegetation type, which is fairly common elsewhere, would have a significance rating of HIGH over the long term, as the area could be rehabilitated.</i></p> <p><i>Example: The change to soil conditions will impact the natural system, and the impact on affected parties (such as people growing crops in the soil) would be HIGH.</i></p>	
MODERATE NEGATIVE	SOME BENEFITS
<p>These impacts will usually result in medium to long term effects on the social and/or natural environment. Impacts rated as MODERATE will need to be considered by society as constituting a fairly important and usually medium term change to the (natural and/or social) environment. These impacts are real but not substantial.</p> <p><i>Example: The loss of a sparse, open vegetation type of low diversity may be regarded as MODERATELY significant.</i></p>	
LOW NEGATIVE	FEW BENEFITS
<p>These impacts will usually result in medium to short term effects on the social and/or natural environment. Impacts rated as LOW will need to be considered by the public and/or the specialist as constituting a fairly unimportant and usually short term change to the (natural and/or social) environment. These impacts are not substantial and are likely to have little real effect.</p> <p><i>Example: The temporary changes in the water table of a wetland habitat, as these systems are adapted to fluctuating water levels.</i></p> <p><i>Example: The increased earning potential of people employed as a result of a development would only result in benefits of LOW significance to people who live some distance away.</i></p>	
NO SIGNIFICANCE	
<p>There are no primary or secondary effects at all that are important to scientists or the public.</p> <p><i>Example: A change to the geology of a particular formation may be regarded as severe from a geological perspective, but is of NO significance in the overall context.</i></p>	
DON'T KNOW	
<p>In certain cases it may not be possible to determine the significance of an impact. For example, the primary or secondary impacts on the social or natural environment given the available information.</p> <p><i>Example: The effect of a particular development on people's psychological perspective of the environment.</i></p>	

10.1.3 Post Mitigation Significance

Once mitigation measure are proposed, the following criteria are then used to determine the overall post mitigation significance of the impact:

- Reversibility: The degree to which an environment can be returned to its original/partially original state.
- Irreplaceable loss: The degree of loss which an impact may cause.
- Mitigation potential: The degree of difficulty of reversing and/or mitigating the various impacts ranges from very difficult to easily achievable. The four categories used are listed and explained in Table 5 below. Both the practical feasibility of the measure, the potential cost and the potential effectiveness is taken into consideration when determining the appropriate degree of difficulty.

Reversibility	
<i>Reversible</i>	<i>The activity will lead to an impact that can be reversed provided appropriate mitigation measures are implemented.</i>
<i>Irreversible</i>	<i>The activity will lead to an impact that is permanent regardless of the implementation of mitigation measures.</i>
Irreplaceable loss	
<i>Resource will not be lost</i>	<i>The resource will not be lost/destroyed provided mitigation measures are implemented.</i>
<i>Resource will be partly lost</i>	<i>The resource will be partially destroyed even though mitigation measures are implemented.</i>
<i>Resource will be lost</i>	<i>The resource will be lost despite the implementation of mitigation measures.</i>
Mitigation potential	
<i>Easily achievable</i>	<i>The impact can be easily, effectively and cost effectively mitigated/reversed.</i>
<i>Achievable</i>	<i>The impact can be effectively mitigated/reversed without much difficulty or cost.</i>
<i>Difficult</i>	<i>The impact could be mitigated/reversed but there will be some difficulty in ensuring effectiveness and/or implementation, and significant costs.</i>
<i>Very Difficult</i>	<i>The impact could be mitigated/reversed but it would be very difficult to ensure effectiveness, technically very challenging and financially very costly.</i>

11 ADDENDUM 3: CONVENTIONS USED TO ASSESS THE SIGNIFICANCE OF HERITAGE

11.1 Site Significance Matrix

According to the NHRA, Section 2(vi) the **significance** of heritage sites and artefacts is determined by its aesthetic, architectural, historical, scientific, social, spiritual, linguistic or technical value in relation to the uniqueness, condition of preservation and research potential. It must be kept in mind that the various aspects are not mutually exclusive, and that the evaluation of any site is done with reference to any number of these. The following matrix is used for assessing the significance of each identified site/feature.

2. SITE EVALUATION			
2.1 Heritage Value (NHRA, section 2 [3])	High	Medium	Low
It has importance to the community or pattern of South Africa’s history or pre-colonial history.			
It possesses unique, uncommon, rare or endangered aspects of South Africa’s natural or cultural heritage.			
It has potential to yield information that will contribute to an understanding of South Africa’s natural and cultural heritage.			
It is of importance in demonstrating the principle characteristics of a particular class of South Africa’s natural or cultural places or objects.			
It has importance in exhibiting particular aesthetic characteristics valued by a particular community or cultural group.			
It has importance in demonstrating a high degree of creative or technical achievement at a particular period.			
It has marked or special association with a particular community or cultural group for social, cultural or spiritual reasons (sense of place).			
It has strong or special association with the life or work of a person, group or organisation of importance in the history of South Africa.			
It has significance through contributing towards the promotion of a local sociocultural identity and can be developed as a tourist destination.			
It has significance relating to the history of slavery in South Africa.			
It has importance to the wider understanding of temporal changes within cultural landscapes, settlement patterns and human occupation.			
2.2 Field Register Rating			
National/Grade 1 [should be registered, retained]			
Provincial/Grade 2 [should be registered, retained]			
Local/Grade 3A [should be registered, mitigation not advised]			
Local/Grade 3B [High significance; mitigation, partly retained]			
Generally Protected A [High/Medium significance, mitigation]			
Generally protected B [Medium significance, to be recorded]			
Generally Protected C [Low significance, no further action]			
2.3 Sphere of Significance	High	Medium	Low
International			
National			
Provincial			
Local			
Specific community			

11.2 Impact Assessment Criteria

The following table provides a guideline for the rating of impacts and recommendation of management actions for sites of heritage potential.

Significance of the heritage resource

This is a statement of the nature and degree of significance of the heritage resource being affected by the activity. From a heritage management perspective, it is useful to distinguish between whether the significance is embedded in the physical fabric or in associations with events or persons or in the experience of a place; i.e. its visual and non-visual qualities. This statement is a primary informant to the nature and degree of significance of an impact and thus needs to be thoroughly considered. Consideration needs to be given to the significance of a heritage resource at different scales (i.e. site-specific, local, regional, national or international) and the relationship between the heritage resource, its setting and its associations.

Nature of the impact

This is an assessment of the nature of the impact of the activity on a heritage resource, with some indication of its positive and/or negative effect/s. It is strongly informed by the statement of resource significance. In other words, the nature of the impact may be historical, aesthetic, social, scientific, linguistic or architectural, intrinsic, associational or contextual (visual or non-visual). In many cases, the nature of the impact will include more than one value.

Extent

Here it should be indicated whether the impact will be experienced:

- On a site scale, i.e. extend only as far as the activity;
- Within the immediate context of a heritage resource;
- On a local scale, e.g. town or suburb
- On a metropolitan or regional scale; or
- On a national/international scale.

Duration

Here it should be indicated whether the lifespan of the impact will be:

- Short term, (needs to be defined in context)
- Medium term, (needs to be defined in context)
- Long term where the impact will persist indefinitely, possibly beyond the operational life of the activity, either because of natural processes or by human intervention; or
- Permanent where mitigation either by natural process or by human intervention will not occur in such a way or in such a time span that the impact can be considered transient.

Of relevance to the duration of an impact are the following considerations:

- Reversibility of the impact; and
- Renewability of the heritage resource.

Intensity

Here it should be established whether the impact should be indicated as:

- Low, where the impact affects the resource in such a way that its heritage value is not affected;
- Medium, where the affected resource is altered but its heritage value continues to exist albeit in a modified way; and
- High, where heritage value is altered to the extent that it will temporarily or permanently be damaged or destroyed.

Probability

This should describe the likelihood of the impact actually occurring indicated as:

- Improbable, where the possibility of the impact to materialize is very low either because of design or historic experience;
- Probable, where there is a distinct possibility that the impact will occur;
- Highly probable, where it is most likely that the impact will occur; or
- Definite, where the impact will definitely occur regardless of any mitigation measures

Confidence

This should relate to the level of confidence that the specialist has in establishing the nature and degree of impacts. It relates to the level and reliability of information, the nature and degree of consultation with I&AP's and the dynamic of the broader socio-political context.

- High, where the information is comprehensive and accurate, where there has been a high degree of consultation and the socio-political context is relatively stable.
- Medium, where the information is sufficient but is based mainly on secondary sources, where there has been a limited targeted consultation and socio-political context is fluid.
- Low, where the information is poor, a high degree of contestation is evident and there is a state of socio-political flux.

Impact Significance

The significance of impacts can be determined through a synthesis of the aspects produced in terms of the nature and degree of heritage significance and the nature, duration, intensity, extent, probability and confidence of impacts and can be described as:

- Low; where it would have a negligible effect on heritage and on the decision
- Medium, where it would have a moderate effect on heritage and should influence the decision.
- High, where it would have, or there would be a high risk of, a big effect on heritage. Impacts of high significance should have a major influence on the decision;
- Very high, where it would have, or there would be high risk of, an irreversible and possibly irreplaceable negative impact on heritage. Impacts of very high significance should be a central factor in decision-making.

11.3 Direct Impact Assessment Criteria

The following table provides an outline of the relationship between the significance of a heritage context, the intensity of development and the significance of heritage impacts to be expected

HERITAGE CONTEXT	TYPE OF DEVELOPMENT			
	CATEGORY A	CATEGORY B	CATEGORY C	CATEGORY D
CONTEXT 1 High heritage Value	Moderate heritage impact expected	High heritage impact expected	Very high heritage impact expected	Very high heritage impact expected
CONTEXT 2 Medium to high heritage value	Minimal heritage impact expected	Moderate heritage impact expected	High heritage impact expected	Very high heritage impact expected
CONTEXT 3 Medium to low heritage value	Little or no heritage impact expected	Minimal heritage impact expected	Moderate heritage impact expected	High heritage impact expected
CONTEXT 4 Low to no heritage value	Little or no heritage impact expected	Little or no heritage impact expected	Minimal heritage value expected	Moderate heritage impact expected
NOTE: A DEFAULT "LITTLE OR NO HERITAGE IMPACT EXPECTED" VALUE APPLIES WHERE A HERITAGE RESOURCE OCCURS OUTSIDE THE IMPACT ZONE OF THE DEVELOPMENT.				
HERITAGE CONTEXTS		CATEGORIES OF DEVELOPMENT		
<p>Context 1: Of high intrinsic, associational and contextual heritage value within a national, provincial and local context, i.e. formally declared or potential Grade 1, 2 or 3A heritage resources</p> <p>Context 2: Of moderate to high intrinsic, associational and contextual value within a local context, i.e. potential Grade 3B heritage resources.</p> <p>Context 3:</p>		<p>Category A: Minimal intensity development</p> <ul style="list-style-type: none"> - No rezoning involved; within existing use rights. - No subdivision involved. - Upgrading of existing infrastructure within existing envelopes - Minor internal changes to existing structures - New building footprints limited to less than 1000m². <p>Category B: Low-key intensity development</p> <ul style="list-style-type: none"> - Spot rezoning with no change to overall zoning of a site. - Linear development less than 100m 		

<p>Of medium to low intrinsic, associational or contextual heritage value within a national, provincial and local context, i.e. potential Grade 3C heritage resources</p> <p>Context 4: Of little or no intrinsic, associational or contextual heritage value due to disturbed, degraded conditions or extent of irreversible damage.</p>	<ul style="list-style-type: none"> - Building footprints between 1000m2-2000m2 - Minor changes to external envelop of existing structures (less than 25%) - Minor changes in relation to bulk and height of immediately adjacent structures (less than 25%). <p>Category C: Moderate intensity development</p> <ul style="list-style-type: none"> - Rezoning of a site between 5000m2-10 000m2. - Linear development between 100m and 300m. - Building footprints between 2000m2 and 5000m2 - Substantial changes to external envelop of existing structures (more than 50%) - Substantial increase in bulk and height in relation to immediately adjacent buildings (more than 50%) <p>Category D: High intensity development</p> <ul style="list-style-type: none"> - Rezoning of a site in excess of 10 000m2 - Linear development in excess of 300m. - Any development changing the character of a site exceeding 5000m2 or involving the subdivision of a site into three or more erven. - Substantial increase in bulk and height in relation to immediately adjacent buildings (more than 100%)
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11.4 Management and Mitigation Actions

The following table provides a guideline of relevant heritage resources management actions is vital to the conservation of heritage resources.

<p>No further action / Monitoring</p> <p>Where no heritage resources have been documented, heritage resources occur well outside the impact zone of any development or the primary context of the surroundings at a development footprint has been largely destroyed or altered, no further immediate action is required. Site monitoring during development, by an ECO or the heritage specialist are often added to this recommendation in order to ensure that no undetected heritage\ remains are destroyed.</p> <p>Avoidance</p> <p>This is appropriate where any type of development occurs within a formally protected or significant or sensitive heritage context and is likely to have a high negative impact. Mitigation is not acceptable or not possible. This measure often includes the change / alteration of development planning and therefore impact zones in order not to impact on resources.</p> <p>Mitigation</p> <p>This is appropriate where development occurs in a context of heritage significance and where the impact is such that it can be mitigated to a degree of medium to low significance, e.g. the high to medium impact of a development on an archaeological site could be mitigated through sampling/excavation of the remains. Not all negative impacts can be mitigated.</p> <p>Compensation</p> <p>Compensation is generally not an appropriate heritage management action. The main function of management actions should be to conserve the resource for the benefit of future generations. Once lost it cannot be renewed. The circumstances around the potential public or heritage benefits would need to be exceptional to warrant this type of action, especially in the case of where the impact was high.</p> <p>Rehabilitation</p> <p>Rehabilitation is considered in heritage management terms as a intervention typically involving the adding of a new heritage layer to enable a new sustainable use. It is not appropriate when the process necessitates the removal of previous historical layers, i.e. restoration of a building or place to the previous state/period. It is an appropriate heritage management action in the following cases:</p> <ul style="list-style-type: none"> - The heritage resource is degraded or in the process of degradation and would benefit from rehabilitation. - Where rehabilitation implies appropriate conservation interventions, i.e. adaptive reuse, repair and maintenance, consolidation and minimal loss of historical fabric. - Where the rehabilitation process will not result in a negative impact on the intrinsic value of the resource. <p>Enhancement</p>
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12 ADDENDUM 4: PALAEOLOGICAL DESKTOP ASSESSMENT

Sturdee Energy PPC Dwaalboom Solar Project

Thabazimbi Local Municipality, Waterberg District Municipality, Limpopo Province

Farm: Schoongesicht 238-KP, Jakhalskraal 239-KP

Fourie, H. Dr heidicindy@yahoo.com

012 322 7632/079 940 6048

Palaeontological Impact Assessment: Desktop Study

Commissioned by: Coastal Environmental Services

39 Harewood Drive, Nahoon Mouth,

East London,

5214

043 726 7809

Ref: Pending

2021/03/05

Irrigasie Formasie - Plant fossil (H. Fourie)



B. Executive summary

Outline of the development project: Coastal Environmental Services has facilitated the appointment of Dr H. Fourie, a palaeontologist, to undertake a Palaeontological Impact Assessment (PIA), Desktop Study of the proposed Sturdee Energy PPC Dwaalboom Solar Plant on Farms Schoongesicht 238-KP and Jakhalskraal 239-KP, Thabazimbi Local Municipality, Waterberg District Municipality, Limpopo Province.

The applicant, Sturdee Energy proposes to construct a PV Solar facility.

The Project includes one locality Option (Figure 2):

Option 1: A rectangular area outlined in yellow with Adriaanshoop to the north, the Dwaalboom aerodrome to the north-east; Schoongesicht railway station to the south-east, and Thabazimbi to the far east. The area is approximately 20 ha in size.

Legal requirements:-

The **National Heritage Resources Act (Act No. 25 of 1999) (NHRA)** requires that all heritage resources, that is, all places or objects of aesthetic, architectural, historical, scientific, social, spiritual, linguistic or technological value or significance are protected. The Republic of South Africa (RSA) has a remarkably rich fossil record that stretches back in time for some 3.5 billion years and must be protected for its scientific value. Fossil heritage of national and international significance is found within all provinces of the RSA. South Africa's unique and non-renewable palaeontological heritage is protected in terms of the National Heritage Resources Act. According to this act, palaeontological resources may not be excavated, damaged, destroyed or otherwise impacted by any development without prior assessment and without a permit from the relevant heritage resources authority.

The main aim of the assessment process is to document resources in the development area and identify both the negative and positive impacts that the development brings to the receiving environment. The PIA therefore identifies palaeontological resources in the area to be developed and makes recommendations for protection or mitigation of these resources.

For this study, resources such as geological maps, scientific literature, institutional fossil collections, satellite images, aerial maps and topographical maps were used. It provides an assessment of the observed or inferred palaeontological heritage within the study area, with recommendations (if any) for further specialist palaeontological input where this is considered necessary.

A Palaeontological Impact Assessment is generally warranted where rock units of **LOW to VERY HIGH** palaeontological sensitivity are concerned, levels of bedrock exposure within the study area are adequate; large scale projects with high potential heritage impact are planned; and where the distribution and nature of fossil remains in the proposed area is unknown. The specialist will inform whether further monitoring and mitigation are necessary.

Types and ranges of heritage resources as outlined in Section 3 of the National Heritage Resources Act (Act No.25 of 1999):

(i) (i) objects recovered from the soil or waters of South Africa, including archaeological and palaeontological objects and material, meteorites and rare geological specimens.

This report adheres to the guidelines of Section 38 (1) of the National Heritage Resources Act (Act No. 25 of 1999). Subject to the provisions of subsections (7), (8) and (9), any person who intends to undertake a development categorised as (a) the construction of a road, wall, power line, pipeline, canal or other similar form of linear development or barrier exceeding 300 m in length; (b) the construction of a bridge or similar structure exceeding 50 m in length; (c) any development or other activity which will change the character of a site (see Section 38); (d)

the re-zoning of a site exceeding 10 000 m² in extent; (e) or any other category of development provided for in regulations by SAHRA or a PHRA authority.

This report (1c) aims to provide comment and recommendations on the potential impacts that the proposed development project could have on the fossil heritage of the area and to state if any mitigation or conservation measures are necessary.

Outline of the geology and the palaeontology:

The geology was obtained from map 1:100 000, Geology of the Republic of South Africa (Visser 1984) and 1:250 000, 2426 Thabazimbi (Schutte 1974).

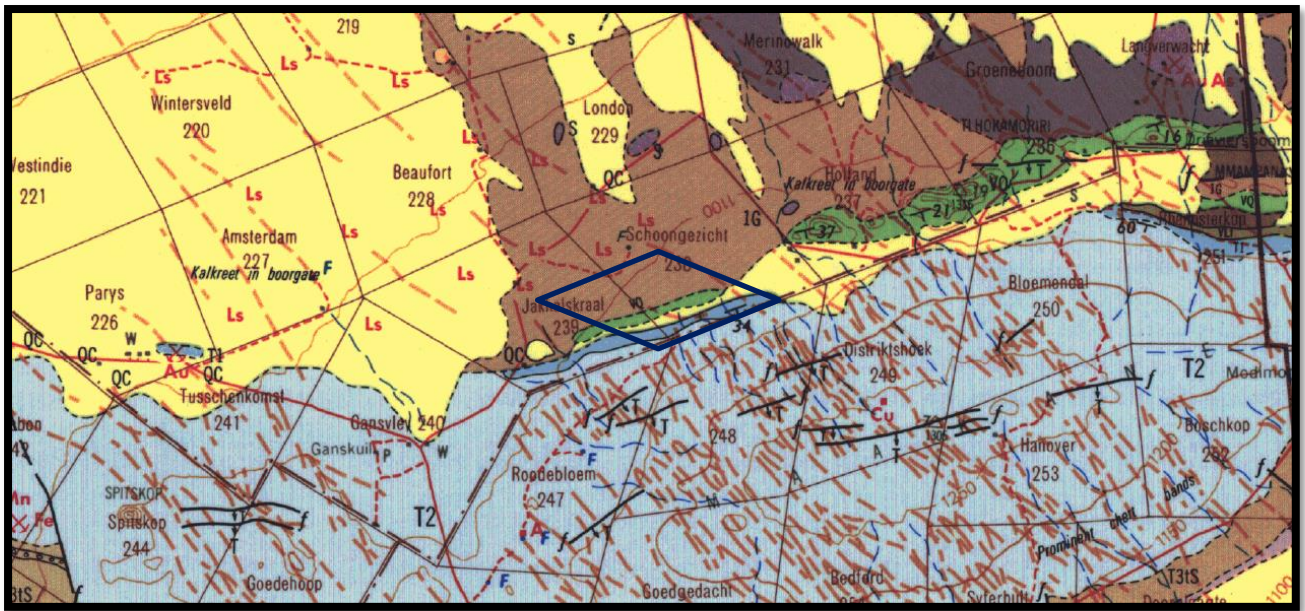


Figure 3: The geology of the development area.

Legend to map and short explanation.

Qc – Black soil, red soil, ferricrete (Qrf), surface conglomerate or breccia and fan-glomerate (QR), calcrete, surface limestone (Qc) (yellow). Quaternary. [M]

T1 – Dolomite, chert, shale, locally with interbedded quartzite [::] (blue). Dolomite Series, Malmani Subgroup, Chuniespoort Group, Transvaal Supergroup. Vaalian. [H]

T2 – Quartzite, grit, conglomerate, shale (dark blue). Black Reef Formation, Transvaal Supergroup. Vaalian. [M]

VQ – Quartzite, arkose, conglomerate (green). Ventersdorp Supergroup. Vaalian. [L]

IG – Granite and granite-gneiss including small scattered occurrences of Swaziland System; largely covered (brown). Western Transvaal belt of metamorphism and mobilization, Archaean Complex. [L]

..... – (black) Lineament (Landsat, aeromagnetic).

----- - Concealed geological boundary.

⊥37° – Strike and dip of bed.

□ – Proposed development (blocked in dark blue).

Over areas totalling fully 40% of Southern Africa the 'hard rocks', from the oldest to the Quaternary, are concealed by normally unconformable deposits – principally sand, gravel, sandstone, and limestone. Inland deposits are much more extensive than marine deposits and are terrestrial and usually unfossiliferous. Some of these deposits date back well into the Tertiary, whereas others are still accumulating. Owing to the all-to-often lack of fossils and of rocks suitable for radiometric or palaeomagnetic dating, no clear-cut dividing line between the Tertiary and

Quaternary successions could be established (Kent 1980). The alluvium sands were deposited by a river system and reworked by wind action (Snyman 1996). A thick cover of Kalahari reddish sand blankets most outcrops and is dominated by the typical Kalahari thornveld (Norman and Whitfield 2006).

The Chuniespoort Group, Transvaal Supergroup, is made up of chemical and biochemical sediments such as dolomite, chert, limestone and banded iron formation, carbonaceous shale is also present. At the top of the Malmani Subgroup is the Duitschland Formation underlain by the Penge and Monte Christo Formations. Sandstone is mostly absent. Cave formation in the dolomite is a major concern in developing areas, especially in the 1500m thick dolomite of the Malmani Subgroup. Chemical sediments such as fine-grained limestone and dolomite is made up of deposits of organically derived carbonate shells, particles or precipitate. Dolomite is magnesium-rich limestone formed from algal beds and stromatolites.

The Black Reef Formation of the Transvaal Supergroup consists of quartzite with lenses of grit and conglomerate. Shale is always present, particularly near the top close to the contact with the overlying dolomite (Kent 1980). It is Vaalian in age and not very thick, only up to 500m in the north-east. It contains a fair amount of gold and the limestone is mined (Snyman 1996).

The Ventersdorp Supergroup consists mainly of andesitic lava, tuff and agglomerate. The Klipriviersberg Group and the Platberg Group are Randian in age, where the Rietgat Formation is Vaalian in age (Sheet information 2626 Wes Rand). The Ventersdorp Supergroup sits disconformably on the Witwatersrand Supergroup and is made up of the lower Klipriviersberg Group, the middle Platberg Group, and two formations (Bothaville and Allanridge). Together it can reach a maximum thickness of 4,260 m in some areas. It is described as an elliptical basin named after the town of Ventersdorp. Sediments accumulated in fault-bounded troughs or grabens and gold can be present (Norman and Whitfield 2006).

The Archaean Complex is probably similar to the Halfway House Dome granite. It occurs north-west of Thabazimbi, between Klerksdorp and Ventersdorp, south of Lichtenburg, west of Schweizer-Reneke and west of Mafikeng (Visser 1989).

Palaeontology - Fossils in South Africa mainly occur in rocks of sedimentary nature and not in rocks from igneous or metamorphic nature. Therefore, if there is the presence of sedimentary strata the palaeontological sensitivity can generally be **LOW** to **VERY HIGH**, and here locally **HIGH** through to **LOW** as indicated in the legend of Figure 3 (SG 2.2 SAHRA APMHOB, 2012).

A very wide range of possible fossil remains occur in the Cenozoic (Quaternary), though these are often sparse, such as: mammalian bones and teeth, tortoise remains, ostrich eggshells, non-marine mollusc shells, ostracods, diatoms, and other micro fossil groups, trace fossils (e.g. calcretised termitaria, rhizoliths, burrows, vertebrate tracks), freshwater stromatolites, plant material such as peats, foliage, wood, pollens, within calc tufa. Stromatolite structures range from a centimetre to several tens of metres in size. They are the result of algal growth in shallow water, indicating a very rich growth that would have caused an enrichment in the amount of oxygen in the atmosphere (Groenewald and Groenewald 2014).

Chemical sediments such as fine-grained limestone and dolomite of the Malmani Subgroup, Chuniespoort Group, is made up of deposits of organically derived carbonate shells, particles or precipitate. Dolomite is magnesium-rich limestone formed from algal beds and stromatolites. These Early Proterozoic Transvaal stromatolitic dolomites formed and released free oxygen at around 2900 – 2400 Ma. Stromatolites are common in the Malmani dolomites, accepted to be the fossil remnants of the simplest single-celled organisms. They are finely layered, concentric,

mound-like structures formed by microscopic algal organisms (Norman and Whitfield 2006). These can range in size from 3.5 - 17 mm in height and up to 10 mm in diameter and can be present in the development area.

The Black Reef Formation is known for stromatolite carbonates and fossiliferous Late Cenozoic cave breccias similar to the Malmani dolomite. Algal microfossils are reported from shales and are probably from diagenetic origin. Stromatolites are preserved in the subordinate carbonate rocks.

Stromatolites may also be present in the Ventersdorp Supergroup.

Summary of findings (1d): The Desktop Palaeontological Impact Assessment was undertaken in March 2021 in summer in hot and dry conditions (1c) during the official Level 1 of the Covid-19 lockdown, and the following is reported:

The Project includes one locality Option (Figure 2):

Option 1: Two roughly rectangular areas outlined in yellow with Adriaanshoop to the north, the Dwaalboom aerodrome to the north-east; Schoongesicht railway station to the south-east, and Thabazimbi to the far east. The area is approximately 20 ha in size.

The only Option presented is situated on the Malmani Subgroup, Black Reef Formation, Quaternary, Ventersdorp Supergroup and Archaean Complex.

Recommendation:

The potential impact of the development on fossil heritage is **HIGH** through to **LOW** and therefore a Phase 1: Field Survey will be necessary for this development if fossils are found during construction. A Phase 2: Mitigation is recommended at the same time (according to SAHRA protocol). For a Chance Fossil Find, the Protocol is attached.

Concerns/threats (1g) to be added to the EMPr:

1. Threats to the National Heritage are earth moving equipment/machinery (for example haul trucks, front end loaders, excavators, graders, dozers) during construction, the sealing-in or destruction of the fossils by development, vehicle traffic, and human disturbance.
2. Special care must be taken during the digging, drilling, blasting and excavating of foundations, trenches, channels and footings and removal of overburden. An appropriate Protocol and Management plan is attached for the Environmental Control Officer (Appendix 2).

The recommendations are (1ni, 1niA, 1nii):

1. Mitigation may be needed (Appendix 2) if fossils (stromatolites) are found.
2. No consultation with parties was necessary. The Environmental Control Officer must familiarise him- or herself with the formations present and its fossils.
3. The development may go ahead, but the ECO must survey for fossils before and or after clearing, blasting, drilling or excavating.
4. The EMPr already covers the conservation of heritage and palaeontological material that may be exposed during construction activities. For a chance find, the protocol is to immediately cease all construction activities, construct a 30 m no-go barrier, and contact SAHRA for further investigation.
5. Care must be taken during the dolomite risk assessment as stromatolites may be present (according SANS 1936-1 (2012)) not to destroy any stromatolites.

Stakeholders: Developer – Sturdee Energy. Second Floor, Grovenor Gate, Hyde Lane Office Park, Hyde Park, Johannesburg, 1000.
 Environmental – Coastal Environmental Services, 39 Harewood Drive, Nahoon Mouth, East London, 5214. Tel: 043 726 7809.
 Landowner – N/a.

Table of Appendix 6 requirements.

Section in Report	Point in Act	Requirement
B	1(c)	Scope and purpose of report
B	1(d)	Duration, date and season
B	1(g)	Areas to be avoided
D	1(ai)	Specialist who prepared report
D	1(aii)	Expertise of the specialist
F Figure 3	1(h)	Map
B	1(ni)(niA)	Authorisation
B	1(nii)	Avoidance, management, mitigation and closure plan
G Table 1	1(cA)	Quality and age of base data
G Table 2	1(cB)	Existing and cumulative impacts
D	1(f)	Details or activities of assessment
G	1(j)	Description of findings
H	1(e)	Description of methodology
H	1(i)	Assumptions
J	1(o)	Consultation
J	1(p)	Copies of comments during consultation
J	1(q)	Information requested by authority
Declaration	1(b)	Independent declaration
Appendix 2	1(k)	Mitigation included in EMPr
Appendix 2	1(l)	Conditions included in EMPr
Appendix 2	1(m)	Monitoring included in EMPr
D	2	Protocol or minimum standard

C. Table of Contents

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D. Background information on the project

Report

This report is part of the environmental impact assessment process under the National Environmental Management Act, as amended (Act No. 107 of 1998) (NEMA) and includes Appendix 6 (May 2019) of the Environmental Impact Assessment Regulations (see Appendix 2). It is also in compliance with The Minimum Standards for Palaeontological Components of Heritage Impact Assessment Reports (2), SAHRA, APMHOB, Guidelines 2012, Pp 1-15.

Outline of development

This report discusses and aims to provide the applicant with information regarding the location of palaeontological material that will be impacted by the development. In the construction phase, it may be necessary for the applicant to apply for the relevant permit from the South African Heritage Resources Agency (SAHRA / PHRA) if a fossil is unearthed.

The applicant, Sturdee Energy proposes to construct a PV Solar facility.

The proposed installed generation capacity for the Plant is 11 MWp DC, with the plant delivering a maximum of 10 MW AC at 35° and power factor of 1 to the existing electricity supply network. A DC/AC ratio of 110% has been considered. Total peak power of the PV plant is 11 MWp, with a total of 23 900 PV modules of 460 Wp each. The location of the solar PV plant has been optimized within the allocated land parcels provided by the Client. A Medium Voltage (MV) overhead line (OHL) has been proposed to interconnect the PV plant to the PPC main distribution substation on each site. The following infrastructure components are proposed:

- Mounting Structures.

The structures chosen are oriented in a North-South axis along a single-axis horizontal axis system, which rotates the panels to orient them, at the sunrise, to the east and, at the sunset, to the West. The reason for this selection was done to enhance the total yield over the life-span of the PV system. On average this system will yield +-15% more energy (kWhrs) at the point of connection every year for the life of the plant, as compared to a fixed-tilt system at an angle of 25 degrees with no tracking. There is an additional capex associated with the tracking system due to the additional control, monitoring and associated tracker system requirements, however the Levelised Cost of Electricity (LCOE) when considered over 20 years will be significantly lower than a fixed-tilt equivalent with all other variables held constant. This system thus has an advantage of providing a significantly lower LCOE owing to the greater solar PV yield. The tracker layout has been optimized to reduce shading significantly. This is achieved by spacing rows at a pitch of 6.5m apart thus preventing majority of inter-row shading losses and reducing back-tracking requirement. Where land is constrained, such as the De Hoek site, we had to reduce pitch distance to 4m to allow the full PV plant DC capacity to fit.

- Buildings.

It is included within our scope of works the construction of the following buildings:

- Substation & control room on site
- The building will be air-conditioned to maintain an adequate temperature-controlled environment for the electronic devices that will be housed within i.e. UPS, park controller, tracker controller, MV switchgear, etc
- Building will contain fire extinguishers, PPE, toolbox, spares, and working table for on-site personnel

- **Civil Works**

All civil works are designed to be capable of withstanding a 100-year storm event, including the effects of water, extreme winds and other natural disasters, without flooding, erosion, settlement or damage.

- **Electrical Connections**

For the interconnection with the existing PPC substation it is required to design, build and commissioning a new 11kV or 6.6kV overhead line (OHL) capable of evacuating up to 10MVA on a continual basis. Eskom Distribution standards and specifications will be used as the reference requirements to design, construct and commission the MV overhead lines.

The Project includes the following related infrastructure (1f):

- Mounting Structures.
- Buildings.
- Civil Works.
- Electrical Connections.

Local benefits of the proposed development include benefits to the local economy through possible job creation, poverty alleviation, food security, and local supplier procurement during the construction phase as well as during the operational phase of the development.

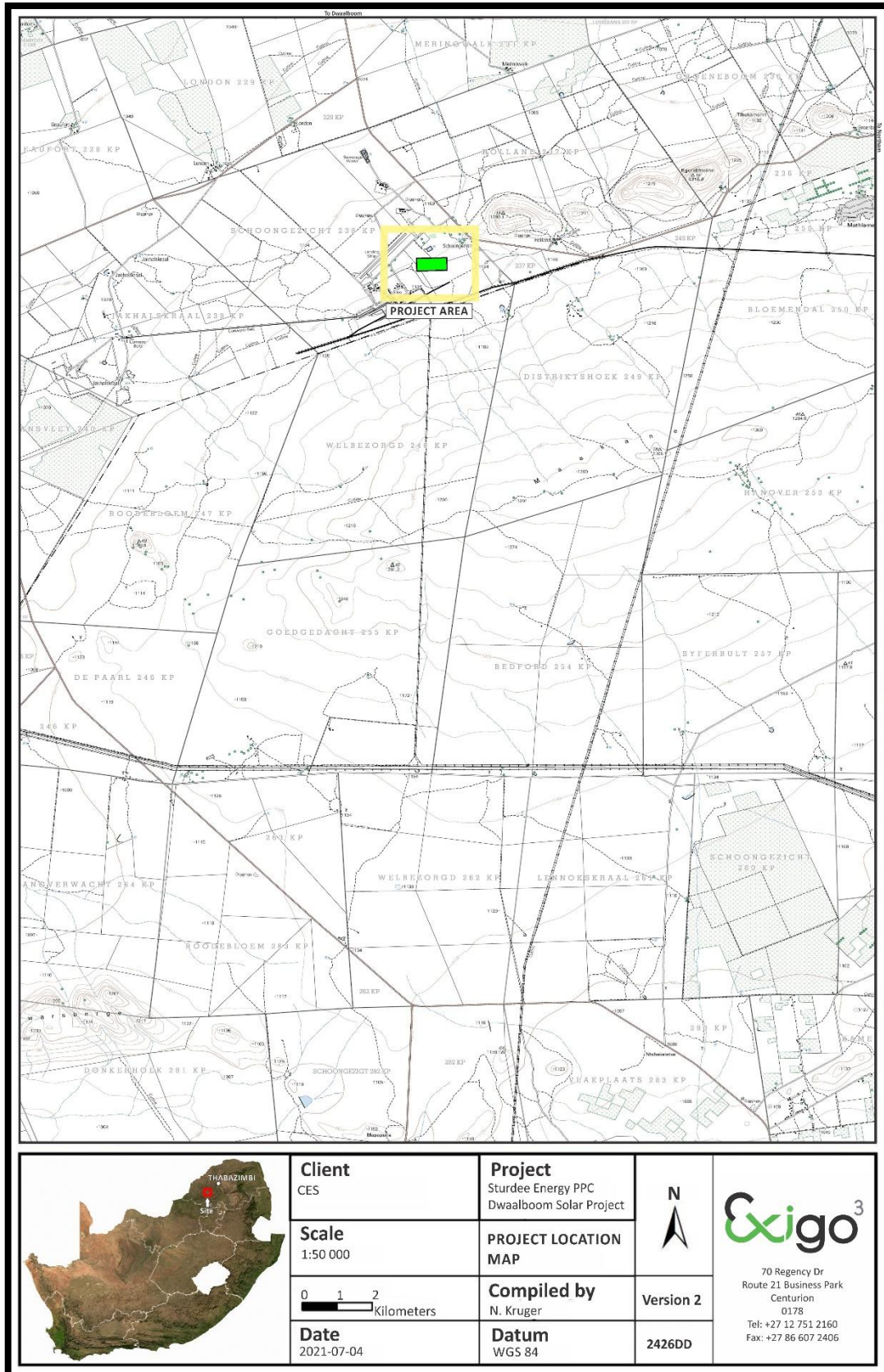


Figure 1: Topographic map (Exigo)

The Project includes one locality Option (Figure 1):

Option 1: A roughly rectangular area with Adriaanshoop to the north, the Dwaalboom aerodrome to the north-east; Schoongesicht railway station to the south-east, and Thabazimbi to the far east. The area is approximately 20 ha in size.

Rezoning/ and or subdivision of land: No.

Name of Developer and Environmental Consultant: Sturdee Energy and Coastal Environmental Services.

Terms of reference: Dr H. Fourie is a palaeontologist commissioned to do a palaeontological impact assessment: field study to ascertain if any palaeontological sensitive material is present in the development area. This study will advise on the impact on fossil heritage mitigation or conservation necessary, if any.

Curriculum vitae – short (1aii, 1aii): Dr Fourie obtained a Ph.D from the Bernard Price Institute for Palaeontological Research (now ESI), University of the Witwatersrand. Her undergraduate degree is in Geology and Zoology. She specialises in vertebrate morphology and function concentrating on the Therapsid Therocephalia. She is currently employed by Ditsong: National Museum of Natural History as Curator of the fossil plant, invertebrate, amphibian, fish, reptile, dinosaur and Therapsid collections. For the past 13 years she carried out field work in the Eastern Cape, Western Cape, North West, Northern Cape, Free State, Gauteng, Limpopo, Kwazulu Natal, and Mpumalanga Provinces. Dr Fourie has been employed at the Ditsong: National Museum of Natural History in Pretoria (formerly Transvaal Museum) for 25 years.

Legislative requirements: South African Heritage Resources Agency (SAHRA) for issue of permits if necessary. National Heritage Resources Act (Act No. 25 of 1999). An electronic copy of this report must be supplied to SAHRA.

E. Description of property or affected environment

Location and depth:

The Proposed Sturdee Energy PPC Dwaalboom Solar Plant will be situated on Farms Schoongesicht 238-KP and Jakhalskraal 239-KP, Thabazimbi Local Municipality, Waterberg District Municipality, Limpopo Province.

Depth is determined by the related infrastructure to be developed and the thickness of the formation in the development area as well as depth of the foundations, footings and channels to be developed. Details of the location and distribution of all significant fossil sites or key fossiliferous rock units are often difficult to determine due to thick topsoil, subsoil, overburden and alluvium. Depth of the overburden may vary a lot. Geological maps do not provide depth or superficial cover, it only provides mappable surface outcrops. The depth can be verified with test pit results or drill cores and is determined by the depth of the building construction. The Malmani Subgroup reaches a thickness of 1500 m.

Qc – Black soil, red soil, ferricrete (Qrf), surface conglomerate or breccia and fan-glomerate (QR), calcrete, surface limestone (Qc) (yellow). Quaternary. [M]

T1 – Dolomite, chert, shale, locally with interbedded quartzite [::] (blue). Dolomite Series, Malmani Subgroup, Chuniespoort Group, Transvaal Supergroup. Vaalian. [H]

T2 – Quartzite, grit, conglomerate, shale (dark blue). Black Reef Formation, Transvaal Supergroup. Vaalian. [M]

VQ – Quartzite, arkose, conglomerate (green). Ventersdorp Supergroup. Vaalian. [L]

IG – Granite and granite-gneiss including small scattered occurrences of Swaziland System; largely covered (brown). Western Transvaal belt of metamorphism and mobilization, Archaean Complex. [L]

----- – (black) Lineament (Landsat, aeromagnetic).

----- - Concealed geological boundary.

⊥37° – Strike and dip of bed.

□ – Proposed development (blocked in dark blue).

Mining Activities on Figure 3:

Ls – Limestone.

The mining past and present has no influence on the development.

Over areas totalling fully 40% of Southern Africa the 'hard rocks', from the oldest to the Quaternary, are concealed by normally unconformable deposits – principally sand, gravel, sandstone, and limestone. Inland deposits are much more extensive than marine deposits and are terrestrial and usually unfossiliferous. Some of these deposits date back well into the Tertiary, whereas others are still accumulating. Owing to the all-to-often lack of fossils and of rocks suitable for radiometric or palaeomagnetic dating, no clear-cut dividing line between the Tertiary and Quaternary successions could be established (Kent 1980). The alluvium sands were deposited by a river system and reworked by wind action (Snyman 1996). A thick cover of Kalahari reddish sand blankets most outcrops and is dominated by the typical Kalahari thornveld (Norman and Whitfield 2006).

Vaalian to post-Mokolian diabase (di) intrusions occur throughout the area in the form of plates, sills and dykes. These plates are common in the Transvaal Supergroup and when present in the Pretoria Group they are referred to as the Transvaal diabase (Kent 1980, Visser 1989). The diabase sills of Bushveld age (Norman and Whitfield 2006) are typically fine-grained, green-grey with plagioclase and pyroxenes (Visser 1989).

The Transvaal Supergroup fills an east-west elongated basin in the south-central part of the old Transvaal (now North – West, Gauteng and Mpumalanga) as far south as Potchefstroom. It is Vaalian in age, approximately 2600 Ma to 2100 Ma. A maximum thickness of the Transvaal Supergroup reaches 2000 m in the north-eastern section. The east-west elongated basin is filled with clastic, volcanic and chemical sedimentary rocks. Three groups based on lithological differences have been established: they are the Rooiberg, Pretoria and Chuniespoort Groups as well as other smaller groups (Kent 1980, Snyman 1996). It is the Bushveld Complex that is responsible for the tilting of the Transvaal sediments and the heat of its intrusion having created andalusite crystals (Norman and Whitfield 2006). This Supergroup is underlain by the Ventersdorp, Witwatersrand and Pongola Supergroups, and the Dominion Group. Three prominent ridges are present from the oldest to the youngest, the Time Ball Hill, Daspoort and Magaliesberg Formations (Norman and Whitfield 2006).

Several formations make up the Platberg Group, the basal Kameeldoorns, Makwassie, and upper Rietgat Formations, the Bothaville and Allanridge Formations are grouped separately (Kent 1980). The Platberg Group consists predominantly of Randian age and Vaalian age rocks. The Rietgat Formation which is the predominant formation in the development area sits concordantly on the Makwassie Formation consisting of green-grey amygdaloidal, porphyritic lava (Garfield Member), interlayered with shale, tuff, greywacke conglomerate, and impure lacustrine limestone with algal stromatolites (2626 Wes Rand sheet info, Kent 1980). Soils forming can be divided into three groups with the solid lavas creating excellent conditions for foundations, the residual soils and the tuffs are not ideal for foundations (Snyman 1996). The Allanridge Formation is andesitic overlying the Bothaville Formation conformably (Kent 1980).

The Archaean Complex is probably similar to the Halfway House Dome granite. It occurs north-west of Thabazimbi, between Klerksdorp and Ventersdorp, south of Lichtenburg, west of Schweizer-Reneke and west of Mafikeng (Visser 1989).

G. Background to Palaeontology of the area (1j)

When rock units of moderate to very high palaeontological sensitivity are present within the development footprint, a desk top and or field scoping (survey) study by a professional palaeontologist is usually warranted. The main purpose of a field scoping (survey) study would be to identify any areas within the development footprint where specialist palaeontological mitigation during the construction phase may be required (SG 2.2 SAHRA AMPHOB, 2012).

One of the formations in the development area may contain fossils. Nixon *et al.* (1988) described the black shales south-west of Potchefstroom as consisting of overlapping laminated basal mounds which are stromatolitic as well as spheroidal possible planktonic fossil algae. These can range in size from 3.5 - 17 mm in height and up to 10 mm in diameter and can be present in the development area.



Figure 5: Photograph of a stromatolite (E. Butler).

A very wide range of possible fossil remains occur in the Cenozoic, though these are often sparse, such as: mammalian bones and teeth, tortoise remains, ostrich eggshells, non-marine mollusc shells, ostracods, diatoms, and other micro fossil groups, trace fossils (e.g. calcretised termitaria, rhizoliths, burrows, vertebrate tracks), freshwater stromatolites, plant material such as peats, foliage, wood, pollens, within calc tufa. Stromatolite structures range from a centimetre to several tens of metres in size. They are the result of algal growth in shallow water, indicating a very rich growth that would have caused an enrichment in the amount of oxygen in the atmosphere (Groenewald and Groenewald 2014).

Fossils will be present in caves, calctufa and pans and examples are a wide range of mammalian bones and teeth, tortoise remains, ostrich egg, non-marine mollusc shells, ostracods, diatoms, other micro fossils, trace fossils, stromatolites, plant remains and wood (Groenewald and Groenewald 2014).

Stromatolites are significant indicators of palaeoenvironments and provide evidence of algal growth between 2640 and 2432 million years ago (Groenewald and Groenewald 2014). Caves in the Malmani dolomite (Vmd) of the Transvaal Supergroup provided a refuge for man's distant ancestors (Norman and Whitfield 2006). These caves are also home to Middle and Late Stone Age cultures. The cave breccia in the Cradle of Humankind, near Johannesburg, yielded internationally renowned hominins such as *Australopithecus africanus and robustus* and extinct mammals and other fauna. The caves are actively being researched and excavated and this has led to many international collaborations. The caves are filled with sediments from the Kalahari Group.

Chemical sediments such as fine-grained limestone and dolomite of the Malmani Subgroup is made up of deposits of organically derived carbonate shells, particles or precipitate. Dolomite is magnesium-rich limestone formed from algal beds and stromatolites. These Early Proterozoic Transvaal stromatolitic dolomites formed and released free oxygen at around 2900 – 2400 Ma. Stromatolites are common in the Malmani dolomites, accepted to be the fossil remnants of the simplest single-celled organisms. They are finely layered, concentric, mound-like structures formed by microscopic algal organisms (Norman and Whitfield 2006). Chert may contain fossils such as echinoids or sponges if nodular, although not common and is rated unlikely.

In the rocks overlying the Black Reef Formation there is evidence for life on an abundant scale as cyanobacteria came to dominate the shallow sea forming stromatolites of varying shapes. Large, elongate stromatolite domes can be seen at Boetsap in the North West Province (McCarthy and Rubidge 2005) and the algal microfossils reported from the Time Ball Hill Formation shales are probably of diagenetic origin (Eriksson 1999).

Table 1: Taken form The Palaeotechnical Report (Groenewald and Groenewald 2014) (1cA).

Qs; Qw; Q; Q40; T5; Qc; Qf; Tc; Q-c; T; @mo2; Te7; Q27; Q3		Aeolian sand, alluvium, colluvium, spring tufa (calcareous) and sinter (siliceous), lake deposits, peats, pedocretes or duricrusts (calcrete, ferricrete), soils, river terrace gravel	Very wide range of possible fossil remains, though these are often sparse, such as: mammalian bones and teeth, tortoise remains, ostrich eggshells, non-marine mollusc shells, ostracods, diatoms and other microfossil groups, trace fossils (e.g. calcretised termitaria, rhizoliths, burrows, vertebrate tracks), freshwater stromatolites, plant material such as peats, foliage, wood, pollens Fossil leaves and palynomorphs within calc tufa	Lake Fundudzi is one of few inland lakes in southern Africa- still to be palaeontologically investigated Key palynological studies on peats from Wonderkrater Spring Mound – important information on palaeoclimate and vegetation change over past 20 000 years
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	Deutschland (Vd)		Conglomerate	No fossils recorded	Good examples of stromatolites in Cradle of Humankind region ALERT FOR POTENTIALLY FOSSILIFEROUS LATE CAENOZOIC CAVE BRECCIAS WITHIN "TRANSVAAL DOLOMITE" OUTCROP AREA (breccias not individually mapped)
	Penge (Vp)		Iron-rich shale	Stromatolites	
	Malmani (Vm; Vmd; Vma)		Stromatolitic carbonates (limestones / dolomites), minor secondary cherts, mudrocks including carbonaceous shales	Range of shallow marine to intertidal stromatolites (domes, columns etc), organic-walled microfossils	
	Black Reef (Vbr)		Siliciclastic sediments (mature sandstones plus minor mudrocks, conglomerates) deposited during a fluvial to shallow marine transition	Possible equivalent of Black Reef Fm in N. Cape (Vryburg Formation) contains stromatolitic carbonates	

VENTERSDORP Rg R01, R02, R03, R04 R05, R06, R07	KUPRIVERBERG Rg		Rai	Predominantly basic lavas with minor metamorphosed sediments (breccias, conglomerates, quartzites) at base of succession Late Archaean (Randian) c. 2.7-2.5 Ga	Lacustrine stromatolites are recorded within the upper Ventersdorp Supergroup (Platberg Group) in the Free State but this younger succession is not mapped in Limpopo	Small outcrop area in W. Limpopo
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ARCHAEOAN GREENSTONE BELTS	Rhenosterkoppies Pietersburg Belts (Zp) Zaa		Mothaba (Zm; Zm1) Eersteling (Ze) Vrighgewaagd (Zv)		Predominantly volcanic igneous rocks, plus some igneous intrusions, minor sediments such as banded iron formation, chert, quartzite, conglomerate, schists (e.g. Pietersburg Group, Utiyik Fm, Gijani Group, Gravelotte Group) Rocks usually tectonised, highly metamorphosed Early to Mid Archaean (Swazian - Randian) 3.5 - 3 Ga Basic intrusions dated 3.5 Ga and younger	Archaean microfossils and microbial trace fossils (bacterial borings) have been recorded from cherts and volcanic glasses in similar-aged greenstone belts elsewhere in RSA (e.g. Fig Tree Group - Overwacht Group of Barberton Greenstone Belt, Mpuumalanga - Swaziland). "Fly speck carbon" in sedimentary Utiyik Fm of the Pietersburg Greenstone Belt, Limpopo, may be fossilised microbes or alternatively of inorganic origin (e.g. an inorganic precipitate induced by radioactive irradiation).	Greenstone Belts provide samples of the oldest known crustal rocks, including minor marine and terrestrial sediments, but the rocks here are usually highly deformed and metamorphosed
	Gijani (Sutherland) Belt (Zg); Zg1; Zg2; Zg3; Zg4; Zg5		Zba1; Zba2; Zba3; Zba4				
	Bandelierkop (Zba1)		Z; Zg; Zg1; Zg2; Zg3; Zg4; Zru				
	Murchison Belt (Zmu)						
	Makoppa Dome greenstones (Z)						

Fossils in South Africa mainly occur in rocks of sedimentary nature and not in rocks from igneous or metamorphic nature. Therefore, if there is the presence of Karoo Supergroup strata the palaeontological sensitivity is generally **LOW** to **VERY HIGH**.

Table 2: Criteria used (Fossil Heritage Layer Browser/SAHRA) (1cB).

Rock Unit	Significance/vulnerability	Recommended Action
Quaternary	Moderate	Desktop Study
Malmani Subgroup	High	Desktop Study and Phase 1: Field Assessment
Black Reef Formation	Moderate	Desktop Study
Ventersdorp Supergroup	Low	Protocol for Chance Finds
Archaean Complex	Low	Protocol for Chance Finds

Databases and collections: Ditsong: National Museum of Natural History. Evolutionary Studies Institute, University of the Witwatersrand (ESI).

Impact: **HIGH**, **MODERATE** and **LOW**. There may be significant fossil resources that may be impacted by the development (shale/dolomite).

The project includes one locality Option (Figure 2) with the above impact.

Option 1: Two roughly rectangular areas outlined in yellow with Adriaanshoop to the north, the Dwaalboom aerodrome to the north-east; Schoongesicht railway station to the south-east, and Thabazimbi to the far east. The area is approximately 20 ha in size.

H. Description of the Methodology (1e)

The palaeontological impact assessment desktop study was undertaken in March 2021 during the official covid-19 lockdown. A Phase 1: Field Study includes a walk through and drive through of the affected portion and photographs (in 20 mega pixels) taken of the site with a digital camera (Canon PowerShot SX620HS). It may be necessary to use a Global Positioning System (GPS) (Garmin eTrex 10) to record outcrops if not covered with topsoil, subsoil, overburden, and vegetation. A literature survey is included and the study relied on literature, geological maps, google.maps, and google.earth images.

SAHRA Document 7/6/9/2/1 requires track records/logs from archaeologists not palaeontologists as palaeontologists concentrate on outcrops which may be recorded on a GPS. Isolated occurrences of rocks usually do not constitute an outcrop. Fossils can occur in dongas, as nodules, in fresh rock exposures, and in riverbeds. Finding fossils require the experience and technical knowledge of the professional palaeontologist, but that does not mean that an amateur can't find fossils. The geology of the region is used to predict what type of fossil and zone will be found in any particular region. An archaeozoologist can be called upon to survey for more recent fossils in the Quaternary and Tertiary deposits, if present.

Assumptions and Limitations (1e):-

The accuracy and reliability of the report **may be** limited by the following constraints:

1. Most development areas have never been surveyed by a palaeontologist or geophysicist.
2. Variable accuracy of geological maps and associated information.
3. Poor locality information on sheet explanations for geological maps.
4. Lack of published data.
5. Lack of rocky outcrops.
6. Inaccessibility of site.
7. Insufficient data from developer and exact lay-out plan for all structures (for this report all required data/information was provided).

A Phase 1 Palaeontological Impact Assessment: Field Study will include:

1. Recommendations for the future of the site.
2. Background information on the project.
3. Description of the property of affected environment with details of the study area.
4. Description of the geological setting and field observations.
5. Background to palaeontology of the area.
6. Heritage rating.
7. Stating of significance (Heritage Value).

A Phase 2 Palaeontological Impact Assessment: Mitigation will include:

1. Recommendations for the future of the site.
2. Description of work done (including number of people and their responsibilities).
3. A written assessment of the work done, fossils excavated, not removed or collected and observed.
4. Conclusion reached regarding the fossil material.
5. A detailed site plan.
6. Possible declaration as a heritage site or Site Management Plan.

The National Heritage Resources Act No. 25 of 1999 further prescribes -

Act No. 25 of 1999. National Heritage Resources Act, 1999.

The National Estate as: 3 (2) (f) archaeological and palaeontological sites, (i)(1) objects recovered from the soil or waters of South Africa, including archaeological and palaeontological objects and material, meteorites and rare geological specimens,
Heritage assessment criteria and grading used: (a) Grade 1: Heritage resources with qualities so exceptional that they are of special national significance;

(b) Grade 2: Heritage resources which, although forming part of the national estate, can be considered to have special qualities which make them significant within the context of a province or a region; and (c) Grade 3: Other heritage resources worthy of conservation.

SAHRA is responsible for the identification and management of Grade 1 heritage resources.

Provincial Heritage Resources Authority (PHRA) identifies and manages Grade 2 heritage resources.

Local authorities identify and manage Grade 3 heritage resources.

No person may damage, deface, excavate, alter, remove from its original position, subdivide or change the planning status of a provincially protected place or object without a permit issued by a heritage resources authority or local authority responsible for the provincial protection.

Archaeology, palaeontology and meteorites: Section 35.

(2) Subject to the provisions of subsection (8) (a), all archaeological objects, palaeontological material and meteorites are the property of the State.

(3) Any person who discovers archaeological or palaeontological objects or material or a meteorite in the course of development or agricultural activity must immediately report the find to the responsible heritage resources authority, or to the nearest local authority offices or museum, which must immediately notify such heritage resources authority.

Mitigation involves planning the protection of significant fossil sites, rock units or other palaeontological resources and/or excavation, recording and sampling of fossil heritage that might be lost during development, together with pertinent geological data. The mitigation may take place before and / or during the construction phase of development. The specialist will require a Phase 2 mitigation permit from the relevant Heritage Resources Authority before a Phase 2 may be implemented.

The Mitigation is done in order to rescue representative fossil material from the study area to allow and record the nature of each locality and establish its age before it is destroyed and to make samples accessible for future research. It also interprets the evidence recovered to allow for education of the public and promotion of palaeontological heritage.

Should further fossil material be discovered during the course of the development (*e. g.* during bedrock excavations), this must be safeguarded, where feasible *in situ*, and reported to a palaeontologist or to the Heritage Resources authority. In situations where the area is considered palaeontologically sensitive (*e. g.* Karoo Supergroup Formations, ancient marine deposits in the interior or along the coast) the palaeontologist might need to monitor all newly excavated bedrock. The developer needs to give the palaeontologist sufficient time to assess and document the finds and, if necessary, to rescue a representative sample.

When a Phase 2 palaeontological impact study is recommended, permission for the development to proceed can be given only once the heritage resources authority has received and approved a Phase 2 report and is satisfied that (a) the palaeontological resources under threat have been adequately recorded and sampled, and (b) adequate development on fossil heritage, including, where necessary, *in situ* conservation of heritage of high significance. Careful planning, including early consultation with a palaeontologist and heritage management authorities, can minimise the impact of palaeontological surveys on development projects by selecting options that cause the least amount of inconvenience and delay.

Three types of permits are available; Mitigation, Destruction and Interpretation. The specialist will apply for the permit at the beginning of the process (SAHRA 2012).

I. Description of significant fossil occurrences

Chemical sediments such as fine-grained limestone and dolomite of the Malmani Subgroup is made up of deposits of organically derived carbonate shells, particles or precipitate. Dolomite is magnesium-rich limestone formed from algal beds and stromatolites. These Early Proterozoic Transvaal stromatolitic dolomites formed and released free oxygen at around 2900 – 2400 Ma. Stromatolites are common in the Malmani dolomites, accepted to be the fossil remnants of the simplest single-celled organisms. They are finely layered, concentric, mound-like structures formed by microscopic algal organisms (Norman and Whitfield 2006). Chert may contain fossils such as echinoids or sponges if nodular, although not common and is rated unlikely.

All of the formations in the development area may contain stromatolites.

Details of the location and distribution of all significant fossil sites or key fossiliferous rock units are often difficult to be determined due to thick topsoil, subsoil, overburden and alluvium. Depth of the overburden may vary a lot.

The threats to the National Palaeontological Heritage are:-

- Earth moving equipment/machinery (for example haul trucks, front end loaders, excavators, graders, dozers) during construction, prospecting, mining activities,
- The sealing-in or destruction of fossils by development, vehicle traffic, and human disturbance. See Description of the Geological Setting (F) above.

J. Recommendation (1o,1p, 1q)

- a. There is no objection (see Recommendation B) to the development, it may be necessary to request a Phase 1 Palaeontological Impact Assessment: Field study to determine whether the development will affect fossiliferous outcrops as the palaeontological sensitivity is **HIGH** with a Phase 2 Palaeontological Mitigation is when a Phase 1 Palaeontological Assessment identified a fossiliferous formation or surface fossils, or if fossils are found during clearing, construction excavations, drilling and blasting. The Protocol for Chance Finds and Management Plan is attached (Appendix 2) for the ECO.
- b. This project will benefit the environment, economy, and social development of the community.
- c. Preferred choice: One locality Option is presented and possible (see Executive Summary).
- d. The following should be conserved: if any palaeontological material is exposed during clearing, digging, excavating, drilling or blasting SAHRA must be notified. All construction activities must be stopped, a 30 m no-go barrier constructed, and a palaeontologist should be called in to determine proper mitigation measures.
- e. Consultation with parties was not necessary.
- f. This report must be submitted to SAHRA together with the Heritage Impact Assessment.

Sampling and collecting:

Wherefore a permit is needed from the South African Heritage Resources Agency (SAHRA / PHRA).

- a. Objections: Cautious. See heritage value and recommendation.
- b. Conditions of development: See Recommendation.
- c. Areas that may need a permit: Only if a fossil is unearthed.
- d. Permits for mitigation: **SAHRA/PHRA**.

K. Conclusions

- a. All the land involved in the development was assessed and none of the property is unsuitable for development (see Recommendation B).

- b. All information needed for the Palaeontological Impact Assessment was provided by the Consultant. All technical information was provided by Coastal Environmental Services.
- c. Areas that would involve mitigation and may need a permit from the South African Heritage Resources Agency are discussed.
- d. The following should be conserved: if any palaeontological material is exposed during digging, excavating, drilling or blasting, SAHRA must be notified. All development activities must be stopped, a 30 m no-go barrier constructed and a palaeontologist should be called in to determine proper mitigation measures, especially for shallow caves.
- e. Condition in which development may proceed: It is further suggested that a Section 37(2) agreement of the Occupational, Health and Safety Act 85 of 1993 is signed with the relevant contractors to protect the environment (fossils) and adjacent areas as well as for safety and security reasons.

L. Bibliography

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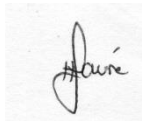
Declaration (disclaimer) (1b)

I, Heidi Fourie, declare that I am an independent consultant and have no business, financial, personal or other interest in the proposed development project for which I was appointed to do a palaeontological assessment. There are no circumstances that compromise the objectivity of me performing such work.

I accept no liability, and the client, by receiving this document, indemnifies me against all actions, claims, demands, losses, liabilities, costs, damages and expenses arising from or in connection with services rendered, directly or indirectly by the use of the information contained in this document.

It may be possible that the Palaeontological Impact Assessment may have missed palaeontological resources in the project area as outcrops are not always present or visible due to vegetation while others may lie below the overburden of earth and may only be present once development commences.

This report may not be altered in any way and any parts drawn from this report must make reference to this report.



Heidi Fourie
2021/03/05

Appendix 1 (1k,1l,1m): Protocol for Chance Finds and Management plan for EMP'r

This section covers the recommended protocol for a Phase 2 Mitigation process as well as for reports where the Palaeontological Sensitivity is **LOW**; this process guides the palaeontologist / palaeobotanist on site and should not be attempted by the layman / developer. As part of the Environmental Authorisation conditions, an Environmental Control Officer (ECO) will be appointed to oversee the construction activities in line with the legally binding Environmental Management Programme (EMPr) so that when a fossil is unearthed they can notify the relevant department and specialist to further investigate. Therefore, the EMPr must be updated to include the involvement of a palaeontologist during the digging and excavation (ground breaking) phase of the development.

The EMPr already covers the conservation of heritage and palaeontological material that may be exposed during construction activities.

- The protocol is to immediately cease all construction activities if a fossil is unearthed and contact SAHRA for further investigation.
- The area must be fenced-off with a 30 m barrier and the construction workers must be informed that this is a no-go area.
- If fossils were found, they must be placed in a safe area for further investigation.
- The ECO should familiarise him- or herself with the fossiliferous formations and its fossils.
- A site visit is recommended after drilling, excavations and blasting and the keeping of a photographic record. A regular monitoring presence over the period during which excavations are made, by a palaeontologist, is generally not practical, but can be done during ground breaking.
- The Evolutionary Studies Institute, University of the Witwatersrand has good examples of Ecca Group Fossils.
- The developer may be asked to survey the areas affected by the development and indicate on plan where the construction / development will take place. Trenches may have to be dug to ascertain how deep the sediments are above the bedrock (can be a few hundred metres). This will give an indication of the depth of the topsoil, subsoil, and overburden, if need be trenches should be dug deeper to expose the interburden.

Mitigation will involve recording, rescue and judicious sampling of the fossil material present in the layers sandwiched between the geological / coal layers (if present). It must include information on number of taxa, fossil abundance, preservational style, and taphonomy. This can only be done during mining or excavations. In order for this to happen, in case of coal mining operations, the process will have to be closely scrutinised by a professional palaeontologist / palaeobotanist to ensure that only the coal layers are mined and the interlayers (siltstone and mudstone) are surveyed for fossils or representative sampling of fossils are taking place.

The palaeontological impact assessment process presents an opportunity for identification, access and possibly salvage of fossils and add to the few good fossil localities. Mitigation can provide valuable onsite research that can benefit both the community and the palaeontological fraternity.

A Phase 2 study is very often the last opportunity we will ever have to record the fossil heritage within the development area. Fossils excavated will be stored at a National Repository.

A Phase 2 Palaeontological Impact Assessment: Mitigation will include (SAHRA) -

1. Recommendations for the future of the site.
2. Description and purpose of work done (including number of people and their responsibilities).
3. A written assessment of the work done, fossils excavated, not removed or collected and observed.
4. Conclusion reached regarding the fossil material.

5. A detailed site plan and map.
6. Possible declaration as a heritage site or Site Management Plan.
7. Stakeholders.
8. Detailed report including the Desktop and Phase 1 study information.
9. Annual interim or progress Phase 2 permit reports as well as the final report.
10. Methodology used.

Three types of permits are available; Mitigation, Destruction and Interpretation. The specialist will apply for the permit at the beginning of the process (SAHRA 2012).

The Palaeontological Society of South Africa (PSSA) does not have guidelines on excavating or collecting, but the following is suggested:

1. The developer needs to clearly stake or peg-out (survey) the areas affected by the mining (if applicable)/ construction/ development operations and dig representative trenches and if possible supply geological borehole data.
2. When clearing topsoil, subsoil or overburden and hard rock (outcrop) is found, the contractor / developer needs to stop all work.
3. A Palaeobotanist / palaeontologist (contact SAHRIS for list) must then inspect the affected areas and trenches for fossiliferous outcrops / layers. The contractor / developer may be asked to move structures, and put the development on hold.
4. If the palaeontologist / palaeobotanist is satisfied that no fossils will be destroyed or have removed the fossils, development and removing of the topsoil can continue.
5. After this process the same palaeontologist / palaeobotanist will have to inspect and offer advice through the Phase 2 Mitigation Process. Bedrock excavations for footings may expose, damage or destroy previously buried fossil material and must be inspected.
6. When permission for the development is granted, the next layer can be removed, if this is part of a fossiliferous layer, then with the removal of each layer of sediment, the palaeontologist / palaeobotanist must do an investigation (a minimum of once a week).
7. At this stage the palaeontologist / palaeobotanist in consultation with the developer / mining company must ensure that a further working protocol and schedule is in place. Onsite training should take place, followed by an annual visit by the palaeontologist / palaeobotanist.

Fossil excavation if necessary, during Phase 2:

1. Photography of fossil / fossil layer and surrounding strata.
2. Once a fossil has been identified as such, the task of extraction begins.
3. It usually entails the taking of a GPS reading and recording lithostratigraphic, biostratigraphic, date, collector and locality information.
4. Use Paraloid (B-72) as an adhesive and protective glue, parts of the fossil can be kept together (not necessarily applicable to plant fossils).
5. Slowly chipping away of matrix surrounding the fossil using a geological pick, brushes and chisels.
6. Once the full extent of the fossil / fossils is visible, it can be covered with a plaster jacket (not necessarily applicable to plant fossils).
7. Chipping away sides to loosen underside.
8. Splitting of the rock containing palaeobotanical material should reveal any fossils sandwiched between the layers.

SAHRA Documents:

Guidelines to Palaeontological Permitting Policy.
Minimum Standards: Palaeontological Component of Heritage Impact Assessment reports.
Guidelines for Field Reports.
Palaeotechnical Reports for all the Provinces.

Appendix 2: Impact Summary

Part of the development footprint is situated on the Malmani Subgroup with a **high** palaeontological sensitivity. The Nature of the impact is the destruction of Fossil Heritage. Loss of fossil heritage will have a negative impact. The probability of the impact occurring is improbable. The expected duration of the impact is assessed as potentially permanent. Only the site will be affected. In the absence of mitigation procedures (should fossil material be present within the affected area) the damage or destruction of any palaeontological materials will be permanent. The loss of resources occurs but natural cultural and social processes continue, albeit in a modified manner. With Mitigation the impact will be low and the cumulative impact is low. Impacts on palaeontological heritage during the construction and preconstruction phase could potentially occur but are regarded as having a low/minor possibility. The significance of the impact occurring will be **low**.