

PALAEONTOLOGICAL HERITAGE: COMBINED DESKTOP & FIELD-BASED SCOPING ASSESSMENT

Proposed Impofu West Wind Farm near Humansdorp, Sarah Baartman District Municipality, Eastern Cape

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EXECUTIVE SUMMARY

Red Cap Impofu West (Pty) Ltd is proposing to develop the Impofu West Wind Farm with approximately 41 wind turbines on a site to the south of the N2 and some 25 km WSW of Humansdorp, Sarah Baartman District Municipality, Eastern Cape. The present palaeontological heritage scoping assessment is based on several desktop and field-based studies in the Humansdorp region including a recent field study of the consolidated Impofu Wind Farms project area.

The Impofu West Wind Farm study area is underlain by several Palaeozoic sedimentary bedrock units of the Cape Supergroup (Table Mountain and Bokkeveld Groups). These include the Cederberg, Baviaanskloof and Gydo Formations that are richly fossiliferous elsewhere in the Cape region. However, on the coastal platform near Humansdorp any fossils originally preserved in these bedrocks appear to have been destroyed by tectonic deformation and deep chemical weathering. Marine trace fossil assemblages within the Peninsula Formation near Rosenhof farmstead (quarry site Q3 in Fig. 6) are conservation-worthy but will not be directly impacted by the proposed development although they are within the wind farm application area. Late Caenozoic superficial sediments overlying the Cape Supergroup bedrocks - such as alluvium, soils and ferricretes - are generally of low palaeontological sensitivity. Relict patches of Plio-Pleistocene aeolianites (wind-blown sands) of the Nanaga Formation (Algoa Group) present in the subsurface on the interior coastal platform contain Early Stone Age artefacts but any associated fossils such as mammalian remains or terrestrial gastropods have probably been destroyed by weathering here. Pleistocene aeolianites close to the coast may contain important concentrations of mammalian fossils, as recorded in the adjoining Gibson Bay WEF project area and near Oyster Bay. The near-coastal palaeodune areas have been excluded from the wind farm footprint (Fig. 3) and significant palaeontological impacts are therefore not anticipated here.

Apart from the trace fossil site in an existing quarry near Rosenhof farmstead no significant fossil sites were recorded during the field survey of the Impofu West Wind Farm project area and the overall palaeontological sensitivity of the area is rated as low. Due to the rarity of well-preserved, unique fossils of potential scientific importance within the study area, potential impacts on palaeontological heritage during the construction phase are assessed as *negligible (negative) significance* (both before and after mitigation). The No-Go alternative (*i.e.*

no wind farm) will have a neutral impact on palaeontological heritage. Cumulative impacts posed by the three separate Impofu Wind Farms are inferred to be *minor*. This also applies to cumulative impacts from known alternative energy developments in the region. Confidence levels for this assessment, which includes consideration of the worst case scenario (> 120 wind turbines for all three Impofu Wind Farms), are high due to comparatively good field data available for the study region.

Two quarry sites of geoheritage / palaeontological interest near Rosenhof Farmstead (sites Q3 and Q4 in Fig. 6; gps data provided in Appendix 2) will not be directly impacted by the proposed wind farm development. If it proves necessary to develop any of these sites, palaeontological mitigation will be required beforehand. This would involve geological and palaeontological documentation as well as sampling of the site by a professional palaeontologist. Pending the potential discovery of significant new fossil remains (e.g. vertebrate bones and teeth, horn cores, shells, trace fossils, plant compressions) during the construction phase of the Impofu West Wind Farm development, no further specialist palaeontological studies or mitigation are recommended for this project in the EIA and construction phases. There are no fatal flaws to the proposed wind farm project as far as fossil heritage is concerned. Providing that the Chance Fossil Finds Procedure outlined below and tabulated in Appendix 1 is followed through, there are no objections on palaeontological heritage grounds to the authorisation of the Impofu West Wind Farm project.

The suitably qualified and experienced Environmental Control Officer (ECO) responsible for the wind farm development construction phase should be made aware of the potential occurrence of scientifically-important fossil remains within the development footprint. During the construction phase all major clearance operations (e.g. for new access roads, turbine placements) and deeper (> 1 m) excavations should be monitored for fossil remains on an on-going basis by the ECO. Should substantial fossil remains be encountered at surface or exposed during construction, the ECO should safeguard these, preferably *in situ* (See Appendix 1: Chance Fossil Finds Procedure). They should then alert the Eastern Cape Provincial Heritage Resources Agency, ECPHRA (Contact details: Mr Sello Mokhanya, 74 Alexander Road, King Williams Town 5600; smokhanya@ecphra.org.za) as soon as possible. This is to ensure that appropriate action (*i.e.* recording, sampling or collection of fossils, recording of relevant geological data) can be taken by a professional palaeontologist at the proponent's expense. These monitoring and mitigation recommendations should be incorporated into the Environmental Management Programme (EMPr) for the Impofu West Wind Farm. The operational and decommissioning phases of this development are unlikely to have further significant impacts on palaeontological heritage and no additional recommendations are made in this regard (The Chance Fossil Finds Procedure still applies).

1. INTRODUCTION

The company Red Cap Energy (Pty) Ltd is overseeing the proposed development of up to three adjoining wind farms with a total of up to 120 wind turbines on a consolidated site of approximately 15 500 hectares (ha) situated to the west of Humansdorp within the Sarah Baartman District Municipality (Kouga and Kou-Kamma Local Municipalities), Eastern Cape (Fig. 1). The consolidated Impofu Wind Farms site is bounded by the operational Gibson Bay and Tsitsikamma Community Wind Farms in the south and west and the Kouga Wind Farm in the east. The construction of the approved Oyster Bay Wind Farm on its eastern boundary will

most likely commence in 2018. The present report provides a scoping-level palaeontological heritage assessment of the proposed Impofu West Wind Farm based on a combined desktop and field-based study of the entire Impofu Wind Farm project area (See Appendix 2). The c.120 km–long 132 kV grid connection between the project area and Port Elizabeth will be assessed separately.

Aurecon South Africa (Pty) Ltd (Aurecon) has been commissioned by the proponent to carry out three Environmental Impact Assessment (EIA) processes for the proposed Wind Farms as well as one Basic Assessment (BA) process for the associated switching stations and transmission lines (Aurecon contact details: Ms Kim White, Aurecon South Africa (Pty) Ltd. Address: Aurecon Centre, 1 Century City Drive, Waterford Precinct, Century City, South Africa. Tel: +27 21 5266013. Fax: +27 21 5269500. E-mail: Kim.White@aurecongroup.com).

2. PROJECT OUTLINE & BRIEF

The proposed Impofu West Wind Farm project area lies south of the N2 trunk road between the Tsitsikamma River and the Impofu Dam, some 25 km WSW of Humansdorp, Eastern Cape (Fig. 1). It totals approximately 3745 hectares in area and comprises the various land parcels shown in map Figure 2. The main infrastructural components of the wind farm that are relevant to the present palaeontological heritage assessment (Fig. 3) include:

- Approximately 41 wind turbines, each of 3-5 MW generation capacity. Each turbine would have a circular foundation of approximately 20-25 m diameter, a temporary disturbed area including the foundation, the hardstand and construction area of approximately 100 x 50 m for use as a laydown area and to accommodate a crane pad during installation, with a permanent hardstand footprint of approximately 50 x 30 m remaining for maintenance purposes.
- Internal access roads. The internal gravel roads will be approximately 6 m wide with potential side drains along the side and of a specification to accommodate the abnormal trucks that will deliver the turbine components. Where possible existing roads will be used and upgraded to avoid additional clearance of natural or agricultural land cover. In exceptional circumstances short sections of the roads may be surfaced with bitumen or concrete if they are excessively steep.
- Underground and overhead medium voltage (MV) power lines (33 kV or lower). These lines would predominantly be in the form of underground cables, but in cases where they have to cross complex terrain such as drainage lines or steep kloofs, they would be short sections of overhead power lines.
- An on-site substation (with transformer) with an associated switching station. Since the switching station component will be owned by Eskom, there will be a physical barrier between the two components in the form of a fence. The total footprint of the substation is approximately 150 x 75 m (11,250 m²) and the adjoining Eskom switching stations would be of a similar size. A total area of 150 x 150 m (22,500 m²) for the consolidated sub/ switching station has been considered in this assessment.
- Control, operation, workshop, storage buildings / areas, also to be located at the on-site substation site.
- The 132 kV line that connects the on-site switching station to the collector substation.

The c.120 km–long 132 kV grid connection between the project area and Port Elizabeth as well as the collector substation will be assessed separately.

2.1. Terms of Reference

The Terms of Reference for the desktop and field-based palaeontological heritage assessment of the Impofu Wind Farms projects have been defined by Aurecon South Africa (Pty) Ltd to comprise (1) three separate Scoping Impact Assessments, one for each wind farm, including the on-site substations and switching stations, internal roads, underground and overground cables, internal 132 kV transmission lines, and upgrading of public roads, as well as (2) one Basic Environmental Assessment for the associated 132 kV grid connection between the project area and Port Elizabeth. This scoping report focuses on the Impofu West Wind Farm.



Figure 1. Google Earth© satellite image of the southern Cape coastal platform to the west of Humansdorp, Eastern Cape, showing the location of the Impofu West Wind Farm study area c. 25 km WSW of Humansdorp, Eastern Cape (yellow polygon).

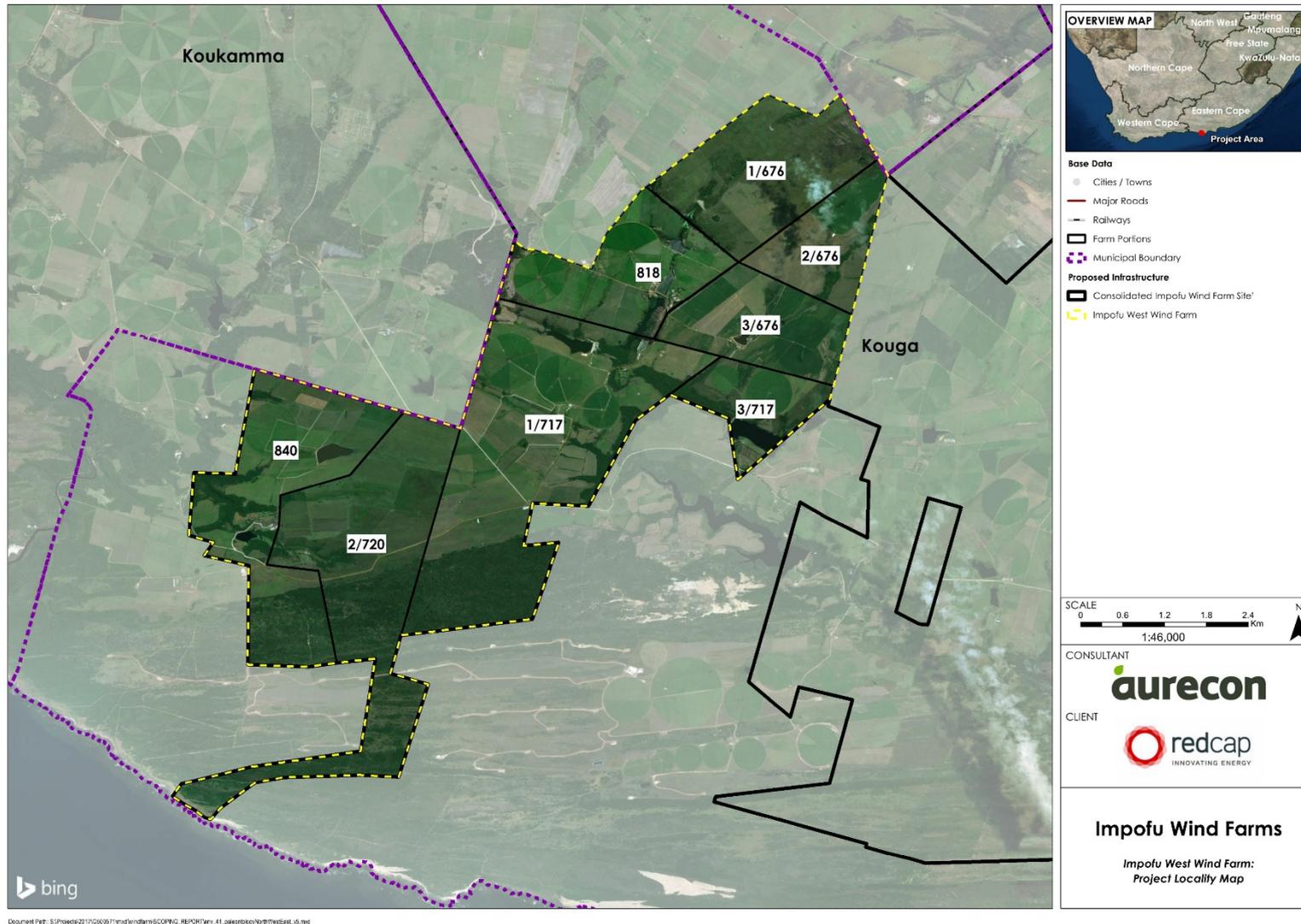


Figure 2: Map showing the location of the land parcels concerned in the proposed Impofu West Wind Farm located c. 25 km WSW of Humansdorp, Sarah Bartaan District Municipality, Eastern Cape (Image provided by Aurecon South Africa (Pty) Ltd).

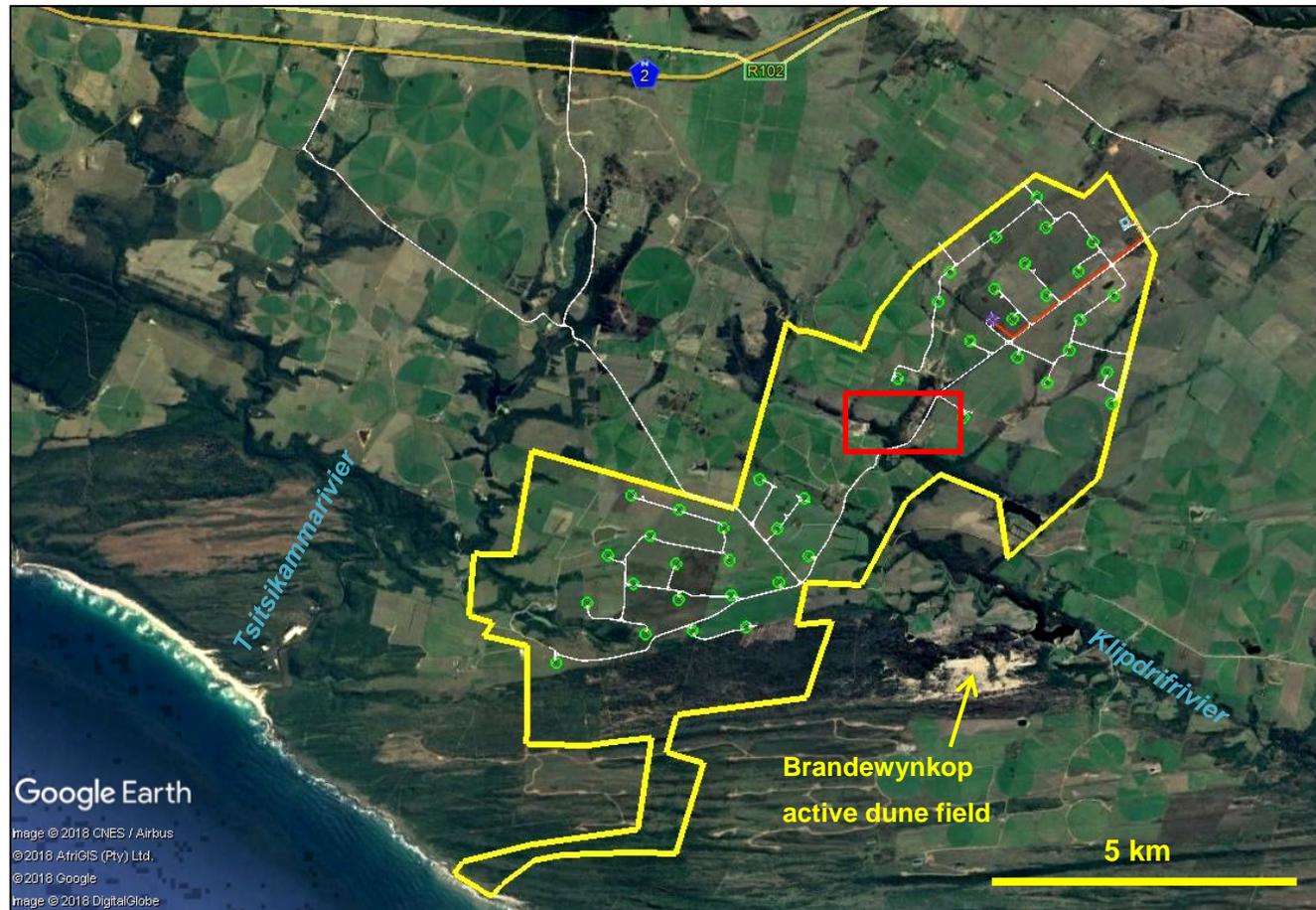


Figure 3. Google Earth© satellite image of the Impofu West Wind Farm study area (yellow polygon) spanning the coastal platform c. 25 km WSW of Humansdorp. The provisional development footprint is indicated, including wind turbine and standing area positions (green), access roads (white) and 132 kV line (red) from the on-site Impofu West Substation (small purple square). Two sites of geological / palaeontological conservation value lie within the small red rectangle (See Fig. 6 for more detail).

3. STUDY APPROACH

This combined desktop and field-based PIA report provides an assessment of the observed or inferred palaeontological heritage within the Impofu West Wind Farm study area, with recommendations for specialist palaeontological mitigation where this is considered necessary. The report is based on (1) a review of the relevant scientific literature, including previous palaeontological impact assessments in the area (e.g. Almond 2010a, 2011a, 2011b, 2011c, 2011d, 2012, 2017 and De Klerk 2010a, 2010b, 2011), (2) published geological maps and accompanying sheet explanations, (3) a four-day field study of the consolidated Impofu Wind Farms study area (23-26 September 2017) and the resulting palaeontological heritage screening report (Almond 2017), as well as (4) the author's extensive field experience with the formations concerned and their palaeontological heritage (Almond *et al.* 2008).

In preparing a palaeontological desktop study the potentially fossiliferous rock units (groups, formations, *etc.*) represented within the study area are determined from geological maps and satellite images. The known fossil heritage within each rock unit is inventoried from the published scientific literature, previous palaeontological impact studies in the same region, and the author's field experience (consultation with professional colleagues as well as examination of institutional fossil collections may play a role here, or later following scoping during the compilation of the final report). This data is then used to assess the palaeontological sensitivity of each rock unit to development (provisional tabulations of palaeontological sensitivity of all formations in the Eastern Cape have already been compiled by J. Almond and colleagues; e.g. Almond *et al.* 2008) and are shown on the palaeosensitivity map on the SAHRIS (South African Heritage Resources Information System) website. The likely impact of the proposed development on local fossil heritage is then determined on the basis of (1) the palaeontological sensitivity of the rock units concerned and (2) the nature and scale of the development itself, most notably the extent of fresh bedrock excavation and ground clearance envisaged. When rock units of moderate to high palaeontological sensitivity are present within the development footprint, a field assessment study by a professional palaeontologist is usually warranted.

The focus of palaeontological field assessment is *not* simply to survey the development footprint or even the development area as a whole (e.g. farms or other parcels of land concerned in the development). Rather, the palaeontologist seeks to assess or predict the diversity, density and distribution of fossils within and beneath the study area, as well as their heritage or scientific interest. This is primarily achieved through a careful field examination of one or more representative exposures of all the sedimentary rock units present (*N.B.* Metamorphic and igneous rocks rarely contain fossils). The best rock exposures are generally those that are easily accessible, extensive, fresh (*i.e.* unweathered) and include a large fraction of the stratigraphic unit concerned (e.g. formation). These exposures may be natural or artificial and include, for example, rocky outcrops in stream or river banks, cliffs, quarries, dams, dongas, open building excavations or road and railway cuttings. Uncemented superficial deposits, such as alluvium, scree or wind-blown sands, may occasionally contain fossils and should also be included in the field study where they are well-represented in the study area. It is normal practice for impact palaeontologists to collect representative, well-localised (e.g. GPS and stratigraphic data) samples of fossil material during field assessment studies. In order to do so, a fossil collection permit from SAHRA is required and all fossil material collected must be properly curated within an approved repository (usually a museum or university collection).

Note that while fossil localities recorded during field work within the study area itself are obviously highly relevant, most fossil heritage here is embedded within rocks beneath the land surface or obscured by surface deposits (soil, alluvium *etc*) and by vegetation cover. In many cases where levels of fresh (*i.e.* unweathered) bedrock exposure are low, the hidden fossil resources have to be *inferred* from palaeontological observations made from better exposures of the same formations elsewhere in the region but outside the immediate study area. Therefore a palaeontologist might reasonably spend far *more* time examining road cuts and borrow pits close to, but outside, the study area than within the study area itself. Field data from localities even further afield (*e.g.* an adjacent province) may also be adduced to build up a realistic picture of the likely fossil heritage within the study area.

On the basis of the desktop and field studies, the likely impact of the proposed development on local fossil heritage and any need for specialist mitigation are then determined. Adverse palaeontological impacts normally occur during the construction rather than the operational or decommissioning phase. Mitigation by a professional palaeontologist – normally involving the recording and sampling of fossil material and associated geological information (*e.g.* sedimentological and taphonomic data) – is usually most effective during the construction phase when fresh fossiliferous bedrock has been exposed by excavations. To carry out mitigation, the palaeontologist involved will need to apply for a palaeontological collection permit from the relevant heritage management authority, the Eastern Cape Provincial Heritage Resources Agency, ECPHRA (Contact details: Mr Sello Mokhanya, 74 Alexander Road, King Williams Town 5600; smokhanya@ecphra.org.za). It should be emphasised that, *providing appropriate mitigation is carried out*, the majority of developments involving bedrock excavation can make a *positive* contribution to our understanding of local palaeontological heritage.

4. ASSUMPTIONS AND LIMITATIONS

The accuracy and reliability of palaeontological specialist studies as components of heritage impact assessments are generally limited by the following constraints:

1. Inadequate database for fossil heritage for much of the RSA, given the large size of the country and the small number of professional palaeontologists carrying out fieldwork here. Most development study areas have never been surveyed by a palaeontologist.
2. Variable accuracy of geological maps which underpin these desktop studies. For large areas of terrain these maps are largely based on aerial photographs alone, without ground-truthing. The maps generally depict only significant (“mappable”) bedrock units as well as major areas of superficial “drift” deposits (alluvium, colluvium) but for most regions give little or no idea of the level of bedrock outcrop, depth of superficial cover (soil *etc*), degree of bedrock weathering or levels of small-scale tectonic deformation, such as cleavage. All of these factors may have a major influence on the impact significance of a given development on fossil heritage and can only be reliably assessed in the field.
3. Inadequate sheet explanations for geological maps, with little or no attention paid to palaeontological issues in many cases, including poor locality information.

4. The extensive relevant palaeontological “grey literature” - in the form of unpublished university theses, impact studies and other reports (e.g. of commercial mining companies) - that is not readily available for desktop studies.
5. Absence of a comprehensive computerised database of fossil collections in major RSA institutions which can be consulted for impact studies.

In the case of palaeontological desktop studies without supporting Phase 1 field assessments these limitations may variously lead to either:

- a) *underestimation* of the palaeontological significance of a given study area due to ignorance of significant recorded or unrecorded fossils preserved there, or
- b) *overestimation* of the palaeontological sensitivity of a study area, for example when originally rich fossil assemblages inferred from geological maps have in fact been destroyed by tectonism or weathering, or are buried beneath a thick mantle of unfossiliferous “drift” (soil, alluvium etc).

Since most areas of the RSA have not been studied palaeontologically, a palaeontological desktop study usually entails *inferring* the presence of buried fossil heritage within the study area from relevant fossil data collected from similar or the same rock units elsewhere, sometimes at localities far away. Where substantial exposures of bedrocks or potentially fossiliferous superficial sediments are present in the study area, the reliability of a palaeontological impact assessment may be significantly enhanced through field assessment by a professional palaeontologist, as in the case of the present study.

In the case of the Impofu West Wind Farm study area bedrock exposure is highly constrained by extensive superficial deposits, especially in areas of low relief, as well as by grassy vegetation. The study area is very extensive and for the most part fairly flat, with some gentle hillslopes (in part related to palaeodunes) and few access roads. However, sufficient bedrock exposures were examined during the course of the four-day field study to assess the palaeontological heritage sensitivity of the main rock units represented within the Impofu Wind Farms study area. Comparatively few academic palaeontological studies have been carried out hitherto in the region, so any new data from impact studies here are of scientific interest. Palaeontological and geological data from the recent field study is usefully supplemented by those from several other field-based fossil heritage impact studies carried out in the Kouga (Humansdorp - Jeffrey’s Bay - Cape St Francis) region by the author and other palaeontologists in recent years (See reference list). Confidence levels for this impact assessment are consequently rated as HIGH, despite the unavoidable constraints of limited exposure, time and access.

5. LEGISLATIVE CONTEXT

The present combined desktop and field-based palaeontological heritage report falls under Sections 35 and 38 (Heritage Resources Management) of the South African Heritage Resources Act (Act No. 25 of 1999), and it will also inform the EMPr for this project.

The various categories of heritage resources recognised as part of the National Estate in Section 3 of the National Heritage Resources Act include, among others:

- geological sites of scientific or cultural importance;
- palaeontological sites;
- palaeontological objects and material, meteorites and rare geological specimens.

According to Section 35 of the National Heritage Resources Act, dealing with archaeology, palaeontology and meteorites:

- (1) The protection of archaeological and palaeontological sites and material and meteorites is the responsibility of a provincial heritage resources authority.
- (2) 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.
- (4) 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.
- (5) When the responsible heritage resources authority has reasonable cause to believe that any activity or development which will destroy, damage or alter any archaeological or palaeontological site is under way, and where no application for a permit has been submitted and no heritage resources management procedure in terms of section 38 has been followed, it may—
 - (a) serve on the owner or occupier of the site or on the person undertaking such development an order for the development to cease immediately for such period as is specified in the order;
 - (b) carry out an investigation for the purpose of obtaining information on whether or not an archaeological or palaeontological site exists and whether mitigation is necessary;
 - (c) if mitigation is deemed by the heritage resources authority to be necessary, assist the person on whom the order has been served under paragraph (a) to apply for a permit as required in subsection (4); and
 - (d) recover the costs of such investigation from the owner or occupier of the land on which it is believed an archaeological or palaeontological site is located or from the person proposing to undertake the development if no application for a permit is received within two weeks of the order being served.

Minimum standards for the palaeontological component of heritage impact assessment reports (PIAs) have been published by SAHRA (2013).

6. GEOLOGICAL CONTEXT

The Impofu West Wind Farm study area is situated on the southern coastal platform in the Kouga region near Humansdorp, Eastern Cape. It spans elevations of from around 200 m amsl on the coastal platform in the northeast down to the sea level at the coast in the southwest. The area is drained by tributaries of the Tsitsikammarivier in the extreme west, of the Kromrivier in the northeast and of the Klipdrifrivier in the centre. The northern and central sectors are characterised by rolling grassy agricultural terrain while west-east trending vegetated aeolian dunes are seen closer to the coast in the south. A small area of active dunes is seen at Brandywynkop just to the south of the study area (Fig. 3).

The geology of the study region to the southwest of Humansdorp is shown on 1: 250 000 geology sheet 3324 Port Elizabeth (Toerien & Hill 1989) (Fig. 4). Detailed information on the geology and palaeontology of the consolidated Impofu Wind Farms site, comprising the Impofu North, Impofu West and Impofu East Wind Farms, was documented in a desktop- and field-based screening study by Almond (2017). Appendix 2 to this report contains the relevant information. The geology of the study region is also described in several previous desktop and field-based studies by the author (notably Almond, 2008, 2012, 2013a, 2013b). It should be emphasised that mapping of the various geological formations in this area is often *schematic* because of the generally poor levels of bedrock exposure; *i.e.* the outcrop areas shown in Fig. 4 may not be very accurate. Detailed, illustrated accounts of the bedrock formations and superficial sediments encountered in the Kouga region have been given in particular by Almond (2012, 2017).

According to the 1: 250 000 geological map, the Impofu West Wind Farm study area is underlain at depth by Ordovician to Early Devonian sediments of the **Table Mountain Group** and **Bokkeveld Group**. These marine to continental Palaeozoic bedrocks are assigned to the **Peninsula, Cederberg, Goudini, Skurweberg, Baviaanskloof and Gydo Formations** of the Cape Supergroup (See stratigraphic column Fig. 5). The Cape Supergroup succession is folded along WNW-ESE fold axes, with a broad outcrop area of Peninsula Formation quartzites in the core of a mega-anticline in the northeast flanked by several tight folds in the southwest. As a result the mudrock-dominated units (Cederberg and Gydo Formations) in particular display high levels tectonic cleavage. Most of the bedrocks also show high levels of near-surface chemical weathering.

Bedrock exposures are poorly-developed in general, especially on the gently-sloping coastal platform, and are largely limited to river and stream banks, erosion gullies, borrow pits and quarries, road and railway cuttings and farm dams (See Appendix 2). Elsewhere the bedrocks are largely obscured by Late Caenozoic superficial sediments such as alluvium along water courses, colluvium (scree) on steeper slopes, downwasted surface gravels and soils.

The dunefields in the southern sector of the study area are assigned to the Late Caenozoic **Algoa Group**. Two separate units of wind-blown sands are mapped here: the older, semi-consolidated and often deeply-weathered **Nanaga Formation** of Plio-Pleistocene age and the younger loose sands of the **Schelm Hoek Formation**. For the most part the west-east trending palaeodunes are stabilised by vegetation but a small area of exposed, partially mobile dune sands is seen in the Brandywynhoek area on the southern side of the Klipdrif Dam. Of geological interest are relict patches of weathered ancient coastal aeolianites (wind-blown sands) that extend intermittently across the interior of the coastal platform as far as the foothills

of the Karreedouwberge. They are provisionally assigned to the Plio-Pleistocene Nanaga Formation. Apart from occasional borrow pits and road cuttings these aeolianite patches are normally soil-covered and are not indicated on the 1: 250 000 scale geological map.

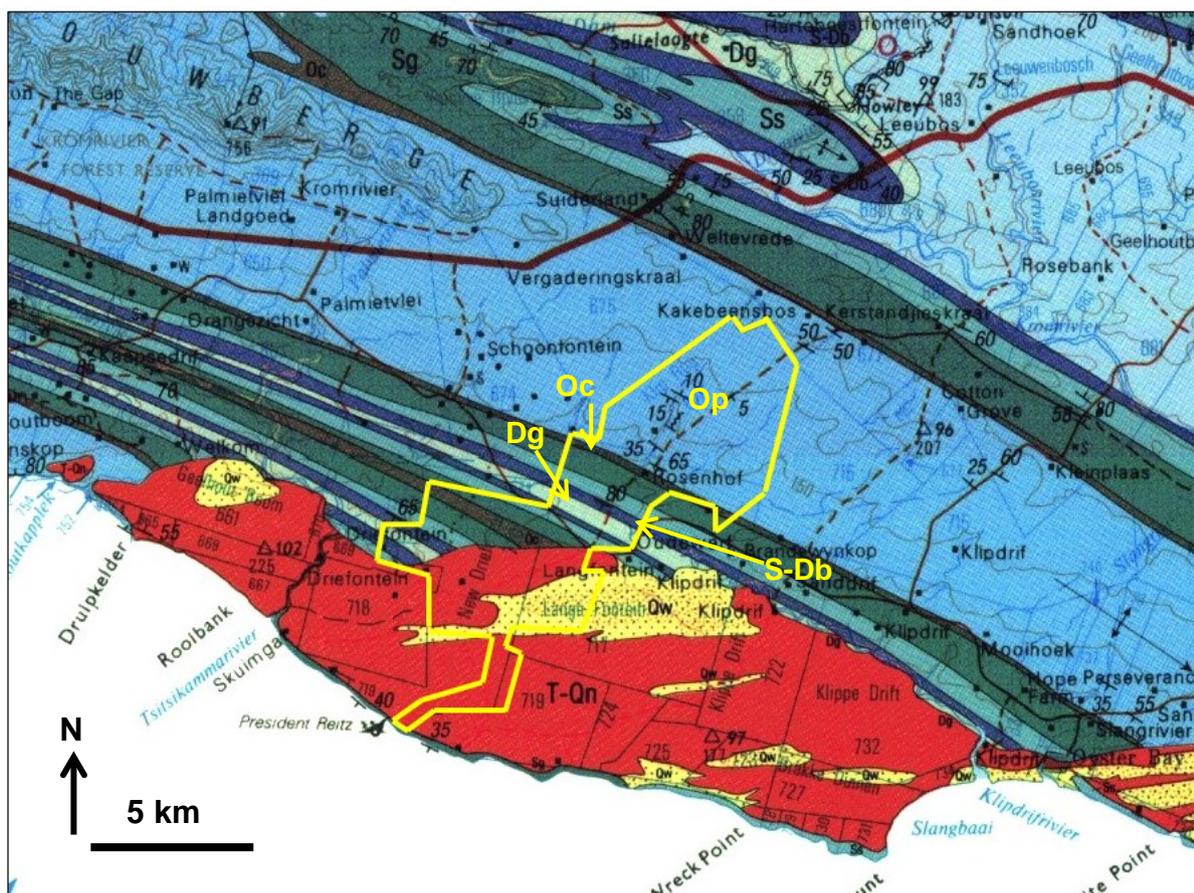


Figure 4. Extract from 1: 250 000 geology sheet 3324 Port Elizabeth (Council for Geoscience, Pretoria) showing *approximate* outline of the Impofu West Wind Farm study area near Humansdorp (yellow polygon). The main geological units represented within the study area include the following formations (Palaeontologically more sensitive marine units indicated in red below). *Please note that geological mapping at 1: 250 000 scale in this region is often schematic due to very poor levels of bedrock exposure.*

TABLE MOUNTAIN GROUP (Ordovician to Early Devonian)

Peninsula Formation (Op, middle blue)

Cedarberg Formation (Oc, grey)

Goudini Formation (Og, grey-green)

Skurweberg Formation (Ss, pale blue)

Baviaanskloof Formation (S-Db, dark blue)

BOKKEVELD GROUP (Early Devonian)

Gydo Formation (Dg, v. pale blue)

ALGOA GROUP (Late Cenozoic, Pliocene / Quaternary to Recent)

Nanaga Formation (T-Qn, orange-brown) – *N.B.* outcrop area is underestimated on map; unmapped relict patches of this formation are present within the present study area.

Schelm Hoek Formation (Qw, yellow with stipple)

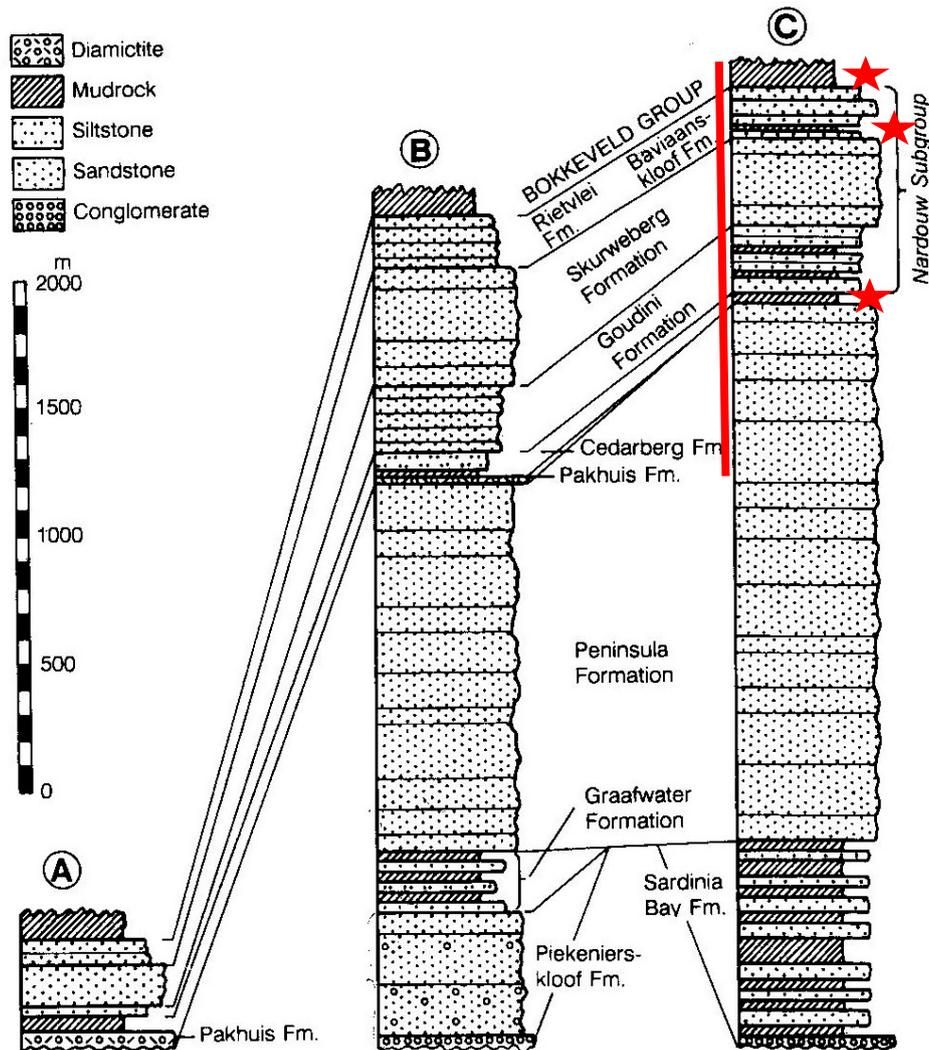


Figure 5. Stratigraphy of the Table Mountain Group and basal Bokkeveld Group (from Thamm & Johnson 2006) showing the bedrock units present in the Impofu Wind Farms study area (vertical red bar). Column C refers to the Eastern Cape region. The Cederberg, Baviaanskloof and Gydo Formations that elsewhere in the Cape are associated with an important fossil record are indicated by red stars. In the Impofu Wind Farms study area these units are apparently secondarily unfossiliferous due to high levels of tectonic deformation and weathering.

7. PALAEOLOGICAL HERITAGE

A fully-referenced review of fossil assemblages that have been recorded from the various geological formations represented within the Kouga study region near Humansdorp has been presented by Almond (2012). Most of the relevant rock units are only sparsely fossiliferous to unfossiliferous. However, *elsewhere* in the broader Cape region diverse and scientifically important fossil assemblages have been recorded from the Cederberg and Baviaanskloof Formations of the Table Mountain Group as well as the Gydo Formation at the base of the Bokkeveld Group (See starred units in stratigraphic column Fig. 5). As concluded by Almond (2017) the palaeontological sensitivity of all these three rock units has been seriously compromised in the Kouga study region as a result of high levels of tectonic deformation (e.g. cleavage formation) as well as deep chemical weathering since the fragmentation of Gondwana some 120 million years ago. Furthermore, the outcrop areas of the mudrock-rich sedimentary successions that are most likely to yield fossil remains are narrow and ill-defined, and are largely mantled in a veneer of superficial deposits such as soil, alluvium and downwasted, ferruginised gravels that shield the fossiliferous bedrocks from significant disturbance during development.

7.1. Fossils in the Table Mountain Group

Body fossils (shells, teeth, bones *etc*) are so far unknown from the **Peninsula Formation** but a modest range of shallow marine to nearshore fluvial and / or estuarine trace fossils have been recognised, mainly from the Western Cape outcrop area. Recessive weathering of trace-rich heterolithic intervals is undoubtedly responsible for under-recording of fossils within the Peninsula Formation. It is likely that relatively unweathered samples of fine-grained muddy sediments within these heterolithic intervals may eventually yield microfossil assemblages (e.g. organic-walled acritarchs) of biostratigraphic and palaeoenvironmental significance. For the most part, Peninsula Formation arenites in the Impofu Wind Farms study area are highly weathered while heterolithic successions rich in mudrock interbeds are not exposed at surface. Unusually abundant, low-diversity trace fossil assemblages of palaeontological significance are recorded, however, in the uppermost Peninsula Formation quarry exposures near Rosenhof farmstead in the Impofu West Wind Farm project area (Almond 2012, 2017) (Q4 quarry indicated in Fig. 6).

An exceptionally important and interesting biota of soft-bodied (*i.e.* unmineralised) and shelly invertebrates, primitive jawless vertebrates and microfossils has been recorded since the middle 1970s from finely laminated, black mudrocks of the **Soom Member**, forming the lower, mudrock-dominated portion of the **Cederberg Formation**. A low diversity shelly faunule, dominated by articulate and inarticulate brachiopods together with a small range of trace fossils is recorded from Western Cape exposures of the heterolithic **Disa Member** that forms the upper portion of the Cederberg Formation. The potentially fossiliferous beds of the Cederberg Formation are almost nowhere exposed within the Impofu Wind Farms study area. Where dark mudrocks have been seen (e.g. near Rosenhof Farmstead in the Impofu West Wind Farm project area) they are too cleaved and weathered to yield recognisable fossils, although some microfossils might still be preserved here.

The fossil record of the **Goudini** and **Skurweberg Formations**, dominated by braided fluvial sandstones, is very sparse indeed. Sporadic, low diversity ichnoassemblages from thin,

marine-influenced stratigraphic intervals have been recorded from all three Nardouw formations in the Western Cape. It is possible that more diverse ichnoassemblages (and even microfossils from subordinate mudrock facies where these have not been deeply weathered or tectonised) may eventually be recorded from the more marine-influenced outcrops of the Eastern Cape Fold Belt.

A distinctive marine shelly invertebrate faunule of Early Devonian, Malvinokaffric aspect characterises the upper portion of the **Baviaanskloof Formation** from the Little Karoo eastwards along the Cape Fold Belt. It is dominated by the globose, finely-ribbed articulate brachiopod *Pleurothyrella africana*. Recently, dense assemblages of primitive vascular plants with forked axes and conical terminal “sporangia” that are provisionally ascribed to the genus *Dutoitia* have been collected from Baviaanskloof Formation mudrocks near Cape St Francis, Eastern Cape (These fossil plants were originally mis-assigned to the Gydo Formation).

With the exception of the uppermost Peninsula Formation trace fossil assemblages found in the existing quarry near Rosenhof farmstead, no body or trace fossils were observed within the Table Mountain Group rocks within the Impofu Wind Farms study area. Apart from low exposure levels, this is probably due to high levels of bedrock weathering beneath the coastal platform.

7.2. Fossils in the Lower Bokkeveld Group (Ceres Subgroup)

The most important fossil groups recorded from the lower Bokkeveld Group (Ceres Subgroup) include shelly marine invertebrates and traces (burrows *etc*), together with rare fish remains, primitive vascular plants (probably mis-assigned to this stratigraphic unit), trace fossils (burrows, borings *etc*) and microfossils (*e.g.* foraminiferans, ostracods, palynomorphs). The overall palaeontological sensitivity of this stratigraphic unit is generally considered to be high to very high. However, most of the early geological mapping surveys revealed very few useful fossil records within the Bokkeveld Group outcrop area in the Eastern Cape – largely a scattering of poorly-preserved, often deformed marine shells and locally abundant trace fossils. The mudrock-dominated Lower Bokkeveld Group sediments in the Humansdorp area are very poorly exposed, and where visible – for example in road cuttings - are deeply weathered and cleaved. The likelihood of useful fossil material being preserved under these circumstances is very low.

7.3. Fossils in the Algoa Group

The sparse palaeontological record of the Pliocene to Early Pleistocene **Nanaga Formation** mainly consists of fragmentary marine shells, foraminifera and a small range of terrestrial snails. Dense arrays of calcretised rhizoliths (root casts) commonly occur in these and contemporary Plio-Pleistocene aeolianites along the southern and southwestern coast; spectacular arrays of *megarhizoliths* were recorded from the Nanaga Formation of the Coega area, Eastern Cape, for example. A wider range of terrestrial fossils might be found here in future, albeit only rarely due to extensive post-depositional diagenesis (*e.g.* solution and re-precipitation of carbonate by groundwater). They might include mammal remains from hyaena lairs, such as are recorded from contemporary Langebaan Formation aeolianites in the SW Cape.

Coastal aeolianites of the Algoa Group are generally of LOW palaeontological sensitivity. However, pockets of HIGH to VERY HIGH sensitivity may occur here, such as Pleistocene mammalian remains and plant material associated with ancient hyaena dens, springs or vleis, and ESA sites. Local examples include important Late Pleistocene hyaena den bone and coprolite assemblages recorded from the Oyster Bay and Gibson Bay WEF areas near Humansdorp by Carrion *et al.* (2000), Nilssen & Smith (2015) and Brink (2015).

No fossil remains were recorded from occasional artificial exposures into relict patches of Pleistocene Nanaga Formation aeolianites in the Impofu Wind Farms project area. The aeolianites here are generally highly weathered and in part ferricretised. They are of archaeological as well as geoheritage interest because they contain locally abundant Early Stone Age artefacts (Almond 2017) (See Q4 quarry site near Rosenhof farmstead indicated in Fig. 6). Any mammalian bones or shells (e.g. terrestrial gastropods) originally preserved within them have probably been destroyed by later weathering and leaching of carbonate.



Figure 6. Google Earth© satellite image of the central part of the Impofu West Wind Farm project area showing the location of two sites of palaeontological / geoheritage interest near Rosenhof farmstead: Q3 quarry (important trace fossil assemblages within the Peninsula Formation) and Q4 quarry (ferricretised Nanaga Formation with ESA stone artefacts). These two sites will not be directly impacted by the proposed wind farm development, although located within the proposed wind farm boundary.

8. ASSESSMENT OF IMPACTS ON PALAEOLOGICAL RESOURCES

The Impofu West Wind Farm study area is underlain by several formations of potentially fossiliferous sediments of the Cape Supergroup and Algoa Group (Sections 6 & 7). Combined desktop and field studies of the broader Impofu Wind Farms project area show that in practice the bedrocks and superficial sediments here are generally of *low* palaeontological sensitivity due to high levels of bedrock deformation as well as chemical weathering (Almond 2012, 2017). The following palaeontological heritage assessment (based on the Aurecon standard assessment methodology and summarised in Table 1 below) applies to the *construction phase* of the wind farm and takes into consideration all the key infrastructural components of the Impofu West Wind Farm outlined in Section 2. These include *inter alia* wind turbines, hard standing areas, access roads, cables and powerlines as well as the combined on-site substation and switching station and associated buildings. Further significant impacts on fossil heritage during the operational and decommissioning phases of the wind farm are not anticipated so these phases are not separately assessed here.

The destruction, damage or disturbance out of context of legally-protected fossils preserved at the ground surface or below ground that may occur during construction of the wind farm entail direct *negative* impacts to palaeontological heritage resources that are confined to the development footprint and limited parts of the site (*very limited extent*). These impacts can often be effectively mitigated (*medium mitigatability*) but they are *permanent* and cannot be fully rectified (*low reversibility*). All of the sedimentary formations represented within the Impofu West Wind Farm study area contain fossils of some sort (e.g. microfossils, trace fossils) but impacts on *scientifically important, well-preserved, unique or rare fossil material* that is worthy of special protection / conservation are likely to be *very rare / improbable*. Impacts of some sort on fossil heritage are definite but, given the general low palaeontological sensitivity of the study area, they are likely to be of *very low intensity* (Local impacts on highly-significant fossil remains – such as rare vertebrate fossils – cannot be completely excluded). Most (but *not* all) of the fossils concerned are likely to be of widespread occurrence within the outcrop areas of the formations concerned; the probability of loss of *unique or rare* fossil heritage is therefore low (*low resource irreplaceability*). Given the extensive palaeontological field and desktop data now available for the study area near Humansdorp, confidence levels for this assessment are rated as *high*.

As a consequence of (1) the paucity of irreplaceable, unique or rare fossil remains within the development footprint, (2) the high levels of chemical weathering in the study area, as well as (3) the extensive superficial sediment cover overlying most potentially-fossiliferous bedrocks within the wind farm study area, the overall impact significance of the construction phase of the proposed wind energy project *without mitigation* is assessed as *minor / negligible* (negative).

Should the recommended mitigation measures for the construction phase of the wind farm – as outlined in the Chance Fossil Finds Procedure (Appendix 1) - be fully implemented, the impact significance of the project is still likely to remain *minor / negligible* (negative). However, in this case any small residual impacts due to loss of fossil heritage would be partially offset by the *positive* impact represented by an improved palaeontological database for the Humansdorp region as a direct result of appropriate mitigation. This is a *positive* outcome because any new, well-recorded and suitably curated fossil material from this

palaeontologically under-recorded part of the Eastern Cape would constitute a useful addition to the scientific understanding of the fossil heritage here.

When considering the **No-Go Alternative** (*i.e.* no wind farm development), impacts on local fossil heritage would be essentially *neutral*. Without development natural weathering processes and erosion will continue to steadily destroy fossils preserved near or at the ground surface, but at the same time new fossils will be continually exposed. This No-Go alternative would forgo potential improvements in the palaeontological understanding of the study region through any mitigated new fossil finds made during construction.

Table 1: Assessment of impacts on fossil heritage resources during the construction phase of the Impofu West Wind Farm near Humansdorp

Project phase	Construction			
Impact	Fossil heritage			
Description of impact	Disturbance, damage or destruction of fossils preserved at surface or below ground as consequence of clearance or excavations (e.g. for access roads, wind turbine foundations, underground cables)			
Mitigatability	Medium	Mitigation exists and will notably reduce significance of impacts		
Potential mitigation	Safeguarding and reporting of chance fossil finds by ECO to ECPHRA. Recording and sampling of significant fossils by professional palaeontologist.			
Assessment	Without mitigation		With mitigation	
Nature	Negative		Negative	
Duration	Permanent	Impact may be permanent, or in excess of 20 years	Permanent	Impact may be permanent, or in excess of 20 years
Extent	Very limited	Limited to specific isolated parts of the site	Very limited	Limited to specific isolated parts of the site
Intensity	Very low	Natural and/ or social functions and/ or processes are slightly altered	Negligible	Natural and/ or social functions and/ or processes are negligibly altered
Probability	Rare / improbable	Conceivable, but only in extreme circumstances, and/or might occur for this project although this has rarely been known to result elsewhere	Rare / improbable	Conceivable, but only in extreme circumstances, and/or might occur for this project although this has rarely been known to result elsewhere
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	Low	The affected environment will not be able to recover from the impact - permanently modified	Low	The affected environment will not be able to recover from the impact - permanently modified
Resource irreplaceability	Medium	The resource is damaged irreparably but is represented elsewhere	Medium	The resource is damaged irreparably but is represented elsewhere
Significance	Negligible - negative		Negligible - negative	
Comment on significance				
Cumulative impacts	Minor			

8.1. Cumulative impacts

Palaeontological heritage assessments for several other alternative energy projects in the broader Jeffrey's Bay – Humansdorp region have been reviewed, including all three proposed Impofu Wind Farms projects that are currently being assessed as individual assessments (See map Fig. 6 and reports by Almond 2010a, 2011a, 2011b, 2011c, 2011d, 2012, 2017 and De Klerk 2010a, 2010b, 2011 in the reference list). The Gibson Bay, Kouga, Jeffrey's Bay and Tsitsikamma Community Wind Farms are currently operational, whereas the remaining wind farms shown in Fig. 6 are proposed. Note that not all these projects are of equal relevance for

cumulative impact assessments since they do not all cover the same spectrum of potentially fossiliferous rock units. Furthermore, cumulative palaeontological impacts are influenced by any substantial development in the region, and not just by wind farms.

All the relevant wind farm studies listed concur in that the palaeontological sensitivity of the Humansdorp region is generally low as far as the bedrocks are concerned, especially because of the high levels of chemical weathering and tectonic deformation observed here. The only significant fossil sites recorded so far are (1) marine trace fossils in the Peninsula Formation in an existing quarry near Rosenhof (Almond 2012, 2017) in the Impofu West Wind Farm project area and (2) the Late Pleistocene hyaena den bone, tooth and coprolite assemblages within Nanaga Formation aeolianites in the Gibson Bay WEF project area and near Oyster Bay (Carrion *et al.* 2000, Nilssen & Smith 2015, Brink 2015). Cumulative impacts of the additional three Impofu Wind Farm projects on fossil heritage – considered individually as well as a consolidated unit - are inferred to be *minor* as far as the Palaeozoic bedrocks are concerned (Almond 2017). This would also apply to impacts on sparse but locally-rich fossil heritage preserved within the coastal aeolianites *provided that* adequate monitoring of major excavations here (e.g. wind turbine footings, roads, substations and other buildings) is carried out during the construction phase.

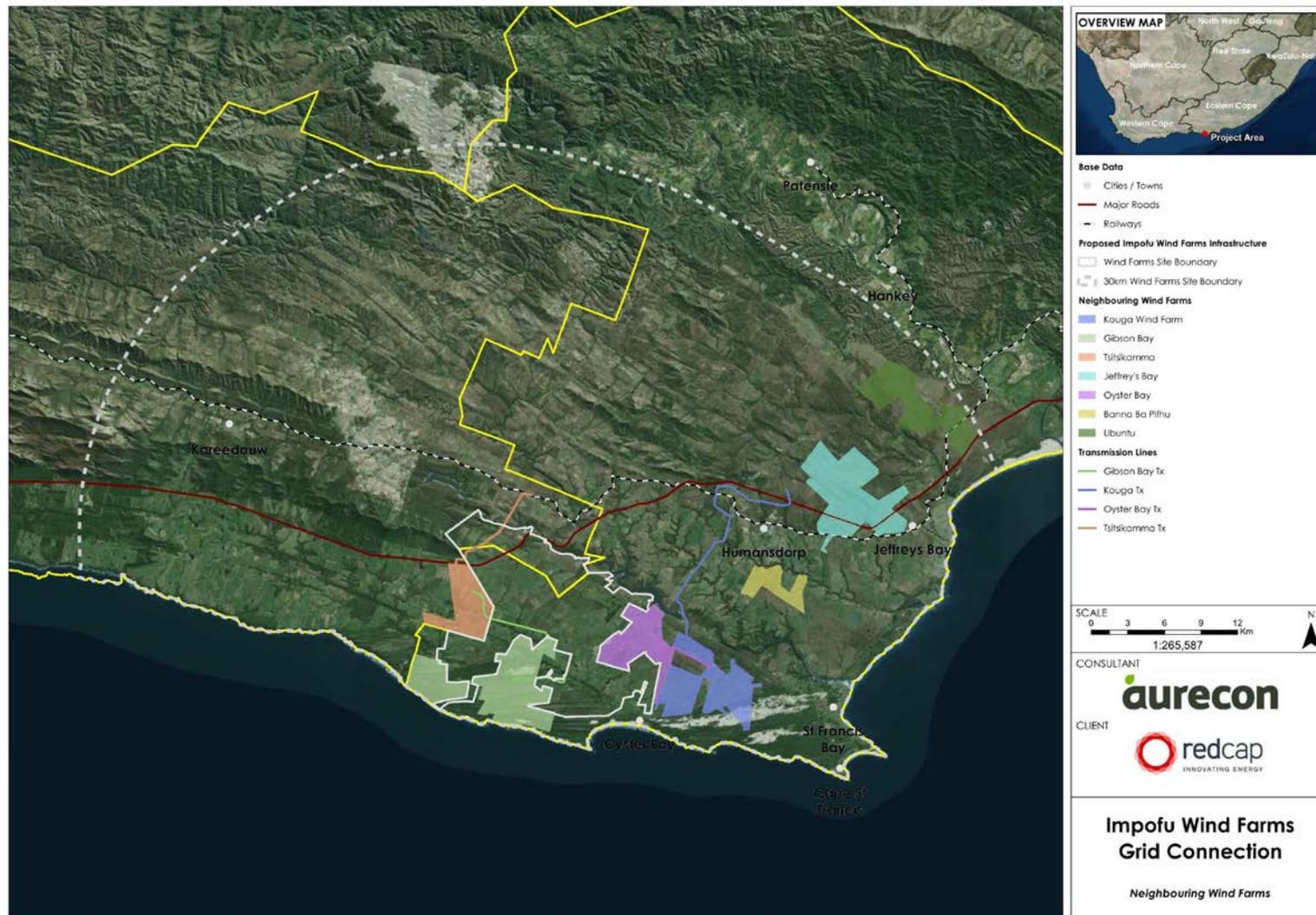


Figure 6. Satellite image showing the various alternative energy developments that are currently operational, as well as those proposed for the Jeffrey's Bay – Humansdorp region surrounding the Impofu Wind Farms project area (white polygon).

9. RECOMMENDED MONITORING AND MITIGATION (FOR INCLUSION IN ENVIRONMENTAL MANAGEMENT PROGRAMME)

Pending the potential discovery of significant new fossil remains (e.g. vertebrate bones and teeth, horn cores, shells, trace fossils, plant compressions) during the construction phase of the Impofu West Wind Farm, no further specialist palaeontological studies or mitigation are recommended for this project. Two quarry sites of geoheritage / palaeontological interest near Rosenhof Farmstead (sites Q3 and Q4 in Fig. 6; gps data provided in Appendix 2) will not be directly impacted by the proposed wind farm development. If it proves necessary to develop any of these sites, palaeontological mitigation will be required beforehand. This would involve geological and palaeontological documentation as well as sampling of the site by a professional palaeontologist.

The suitably qualified and experienced Environmental Control Officer (ECO) responsible for the wind farm development construction phase should be made aware of the potential occurrence of scientifically-important fossil remains within the development footprint. During the construction phase all major clearance operations (e.g. for new access roads, turbine placements, substations and other buildings) and deeper (> 1 m) excavations should be monitored for fossil remains on an on-going basis by the ECO. Should substantial fossil remains be encountered at surface or exposed during construction, the ECO should safeguard these, preferably *in situ* (See Appendix 1: Chance Fossil Finds Procedure). They should then alert the Eastern Cape Provincial Heritage Resources Agency, ECPHRA (Contact details: Mr Sello Mokhanya, 74 Alexander Road, King Williams Town 5600; smokhanya@ecphra.org.za) as soon as possible. This is to ensure that appropriate action (*i.e.* recording, sampling or collection of fossils, recording of relevant geological data) can be taken by a professional palaeontologist at the proponent's expense. These recommendations are summarized in the tabulated Chance Fossil Finds Procedure appended to this report (Appendix 1).

The palaeontologist concerned with any mitigation work will need a valid fossil collection permit from ECPHRA and any material collected would have to be curated in an approved depository (e.g. museum or university collection). All palaeontological specialist work would have to conform to international best practice for palaeontological fieldwork and the study (e.g. data recording fossil collection and curation, final report) should adhere as far as possible to the minimum standards for Phase 2 palaeontological studies developed by SAHRA (2013).

These monitoring and mitigation recommendations are to be incorporated into the Environmental Management Programme (EMPr) for the Impofu West Wind Farm. The operational and decommissioning phases of the development are unlikely to have further significant impacts on palaeontological heritage and no additional recommendations are made in this regard (The Chance Fossil Finds Procedure still applies).

10. CONCLUSIONS

The present palaeontological heritage scoping assessment is based on several desktop and field-based studies in the Kouga region near Humansdorp, including a field study of the consolidated Impofu Wind Farms project area. The Impofu West Wind Farm study area is underlain by several Palaeozoic sedimentary bedrock units of the Cape Supergroup (Table Mountain and Bokkeveld Groups). These include the Cederberg, Baviaanskloof and Gydo

Formations that are richly fossiliferous elsewhere in the Cape region. However, on the coastal platform near Humansdorp any fossils originally preserved in these bedrocks appear to have been destroyed by tectonic deformation and deep chemical weathering. The overlying Late Cenozoic superficial sediments such as alluvium, soils and ferricretes, are likewise of low palaeontological sensitivity. Relict patches of Plio-Pleistocene aeolianites (wind-blown sands) of the Nanaga Formation (Algoa Group) present in the subsurface on the interior coastal platform contain Early Stone Age artefacts but any associated fossils such as mammalian remains or terrestrial gastropods have probably been destroyed by weathering here. Pleistocene aeolianites close to the coast may contain important concentrations of mammalian fossils, as recorded in the adjoining Gibson Bay WEF project area and near Oyster Bay. The near-coastal palaeodune areas have been excluded from the wind farm footprint (Fig. 3) and significant palaeontological impacts are therefore not anticipated here.

Potential impacts to fossil heritage resources within the Impofu West Wind Farm study area involve the disturbance, damage or destruction of fossil material within the development footprint during the construction phase. Due to the rarity of well-preserved, unique fossils of potential scientific importance within the study area, potential impacts on palaeontological heritage during the construction phase are assessed as of *negligible (negative) significance* (both before and after mitigation). The No-Go alternative (*i.e.* no wind farm) will have a neutral impact on palaeontological heritage. Cumulative impacts posed by the three separate Impofu Wind Farms are inferred to be *minor*. This also applies to cumulative impacts from known alternative energy developments in the region. Confidence levels for this assessment, which includes consideration of the worst case scenario (> 120 wind turbines for all three Impofu Wind Farms), are high due to comparatively good field data available for the study region.

Pending the potential discovery of significant new fossil remains (*e.g.* vertebrate bones and teeth, horn cores, shells, trace fossils, plant compressions) during the construction phase of the Impofu West Wind Farm development, no further specialist palaeontological studies or mitigation are recommended for this project in the EIA and construction phases.

There are no fatal flaws to the proposed wind farm project as far as fossil heritage is concerned. Providing that the Chance Fossil Finds Procedure outlined below and tabulated in Appendix 1 is followed through, there are no objections on palaeontological heritage grounds to authorisation of the Impofu West Wind Farm project.

The suitably qualified and experienced Environmental Control Officer (ECO) responsible for the wind farm development construction phase should be made aware of the potential occurrence of scientifically-important fossil remains within the development footprint. During the construction phase all major clearance operations (*e.g.* for new access roads, turbine placements) and deeper (> 1 m) excavations should be monitored for fossil remains on an ongoing basis by the ECO. Should substantial fossil remains be encountered at surface or exposed during construction, the ECO should safeguard these, preferably *in situ*. They should then alert the Eastern Cape Provincial Heritage Resources Agency, ECPHRA (Contact details: Mr Sello Mokhanya, 74 Alexander Road, King Williams Town 5600; smokhanya@ecphra.org.za) as soon as possible. This is to ensure that appropriate action (*i.e.* recording, sampling or collection of fossils, recording of relevant geological data) can be taken by a professional palaeontologist at the proponent's expense. These recommendations are summarized in the tabulated Chance Fossil Finds Procedure appended to this report (Appendix 1).

The palaeontologist concerned with any mitigation work will need a valid fossil collection permit from ECPHRA and any material collected would have to be curated in an approved depository (e.g. museum or university collection). All palaeontological specialist work would have to conform to international best practice for palaeontological fieldwork and the study (e.g. data recording fossil collection and curation, final report) should adhere as far as possible to the minimum standards for Phase 2 palaeontological studies developed by SAHRA (2013).

These monitoring and mitigation recommendations are to be incorporated into the Environmental Management Programme (EMPr) for the Impofu West Wind Farm. The operational and decommissioning phases of this development are unlikely to have further significant impacts on palaeontological heritage and no additional recommendations are made in this regard (The Chance Fossil Finds Procedure still applies).

11. ACKNOWLEDGEMENTS

Mr Lance Blaine of Red Cap Energy (Pty) Ltd, Hout Bay as well as Ms Kim White of Aurecon South Africa (Pty) Ltd, Cape Town, are both thanked for commissioning this study, for discussing the project approach, for facilitating the fieldwork and reviewing the draft reports, as well as for providing the necessary background information. I am grateful to Dr. Peter Nilssen for helpful discussions on heritage aspects of the Impofu Wind Farms study area.

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13. QUALIFICATIONS & EXPERIENCE OF THE AUTHOR

Dr John Almond has an Honours Degree in Natural Sciences (Zoology) as well as a PhD in Palaeontology from the University of Cambridge, UK. He has been awarded post-doctoral research fellowships at Cambridge University and in Germany, and has carried out palaeontological research in Europe, North America, the Middle East as well as North and South Africa. For eight years he was a scientific officer (palaeontologist) for the Geological Survey / Council for Geoscience in the RSA. His current palaeontological research focuses on fossil record of the Precambrian - Cambrian boundary and the Cape Supergroup of South Africa. He has recently written palaeontological reviews for several 1: 250 000 geological maps published by the Council for Geoscience and has contributed educational material on fossils and evolution for new school textbooks in the RSA.

Since 2002 Dr Almond has also carried out palaeontological impact assessments for developments and conservation areas in the Western, Eastern and Northern Cape, Limpopo,

Northwest, Gauteng, KwaZulu-Natal and the Free State under the aegis of his Cape Town-based company *Natura Viva cc*. He has served as a long-standing member of the Archaeology, Palaeontology and Meteorites Committee for Heritage Western Cape (HWC) and an advisor on palaeontological conservation and management issues for the Palaeontological Society of South Africa (PSSA), HWC and SAHRA. He is currently compiling technical reports on the provincial palaeontological heritage of Western, Northern and Eastern Cape for SAHRA and HWC. Dr Almond is an accredited member of PSSA and APHP (Association of Professional Heritage Practitioners – Western Cape).

Declaration of Independence

I, John E. Almond, declare that I am an independent consultant and have no business, financial, personal or other interest in the proposed development project, application or appeal in respect of which I was appointed other than fair remuneration for work performed in connection with the activity, application or appeal. There are no circumstances that compromise the objectivity of my performing such work.



Dr John E. Almond
Palaeontologist
Natura Viva cc

APPENDIX 1: CHANCE FOSSIL FINDS PROCEDURE: Impofu West Wind Farm near Humansdorp	
Province & region:	EASTERN CAPE, Sarah Baartman District Municipality
Responsible Heritage Resources Authority	ECPHRA (Contact details: Mr Sello Mokhanya, 74 Alexander Road, King Williams Town 5600; smokhanya@ecphra.org.za)
Rock unit(s)	Cederberg & Baviaanskloof Formation (Table Mountain Group), Gydo Formation (Bokkeveld Group); Nanaga Formation (Algoa Group).
Potential fossils	Shelly marine invertebrates & trace fossils, plant compressions, rare fish. Mammalian teeth & bones in aeolianites.
ECO protocol	1. Once alerted to fossil occurrence(s): alert site foreman, stop work in area immediately (<i>N.B.</i> safety first!), safeguard site with security tape / fence / sand bags if necessary.
	2. Record key data while fossil remains are still <i>in situ</i> : <ul style="list-style-type: none"> • Accurate geographic location – describe and mark on site map / 1: 50 000 map / satellite image / aerial photo • Context – describe position of fossils within stratigraphy (rock layering), depth below surface • Photograph fossil(s) <i>in situ</i> with scale, from different angles, including images showing context (e.g. rock layering)
	3. If feasible to leave fossils <i>in situ</i> : <ul style="list-style-type: none"> • Alert Heritage Resources Authority and project palaeontologist (if any) who will advise on any necessary mitigation • Ensure fossil site remains safeguarded until clearance is given by the Heritage Resources Authority for work to resume
	3. If <i>not</i> feasible to leave fossils <i>in situ</i> (emergency procedure only): <ul style="list-style-type: none"> • <i>Carefully</i> remove fossils, as far as possible still enclosed within the original sedimentary matrix (e.g. entire block of fossiliferous rock) • Photograph fossils against a plain, level background, with scale • Carefully wrap fossils in several layers of newspaper / tissue paper / plastic bags • Safeguard fossils together with locality and collection data (including collector and date) in a box in a safe place for examination by a palaeontologist • Alert Heritage Resources Authority and project palaeontologist (if any) who will advise on any necessary mitigation
	4. If required by Heritage Resources Authority, ensure that a suitably-qualified specialist palaeontologist is appointed as soon as possible by the developer.
5. Implement any further mitigation measures proposed by the palaeontologist and Heritage Resources Authority	
Specialist palaeontologist	Record, describe and judiciously sample fossil remains together with relevant contextual data (stratigraphy / sedimentology / taphonomy). Ensure that fossils are curated in an approved repository (e.g. museum / university / Council for Geoscience collection) together with full collection data. Submit Palaeontological Mitigation report to Heritage Resources Authority. Adhere to best international practice for palaeontological fieldwork and Heritage Resources Authority minimum standards.