



SIVEST SA (PTY) LTD

PROPOSED DEVELOPMENT OF THE KLIPKRAAL WIND ENERGY FACILITY (WEF) 3 AND ASSOCIATED INFRASTRUCTURE NEAR FRASERBURG IN THE NORTHERN CAPE PROVINCE

# Paleontological Impact Assessment

**DEFF Reference**: TBA

Report Prepared by: Banzai Environmental Pty Ltd

**Issue Date:** 28 November 2022

Version No.: 01

**Declaration of Independence** 

I, Elize Butler, declare that -

General declaration:

• I act as the independent palaeontological specialist in this application

• I will perform the work relating to the application in an objective manner, even if this results

in views and findings that are not favorable to the applicant

I declare that there are no circumstances that may compromise my objectivity in performing

such work;

I have expertise in conducting palaeontological impact assessments, including knowledge

of the Act, Regulations and any guidelines that have relevance to the proposed activity;

• I will comply with the Act, Regulations, and all other applicable legislation;

I will take into account, to the extent possible, the matters listed in section 38 of the NHRA

when preparing the application and any report relating to the application;

I have no, and will not engage in, conflicting interests in the undertaking of the activity;

I undertake to disclose to the applicant and the competent authority all material information

in my possession that reasonably has or may have the potential of influencing - any

decision to be taken with respect to the application by the competent authority; and - the

objectivity of any report, plan, or document to be prepared by myself for submission to the

competent authority;

I will ensure that information containing all relevant facts in respect of the application is

distributed or made available to interested and affected parties and the public and that

participation by interested and affected parties is facilitated in such a manner that all

interested and affected parties will be provided with a reasonable opportunity to participate

and to provide comments on documents that are produced to support the application;

I will provide the competent authority with access to all information at my disposal regarding

the application, whether such information is favorable to the applicant or not

All the particulars furnished by me in this form are true and correct;

I will perform all other obligations as expected a palaeontological specialist in terms of the

Act and the constitutions of my affiliated professional bodies; and

I realize that a false declaration is an offense in terms of regulation 71 of the Regulations

and is punishable in terms of section 24F of the NEMA.

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# Disclosure of Vested Interest

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

Banzai Environmental (Pty) Ltd PALAEONTOLOGICAL CONSULTANT:

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# PROPOSED DEVELOPMENT OF THE KLIPKRAAL WIND ENERGY FACILITY (WEF) 2 NEAR FRASERBURG IN THE NORTHERN CAPE PROVINCE

# Paleontological Impact Assessment

# **EXECUTIVE SUMMARY**

PGS Heritage (Pty) Ltd (PGS) has been commissioned by SiVEST (PTY) Ltd (hereafter referred to as "SiVEST"), on behalf of Klipkraal Wind Energy Facility 3 (Pty) Ltd (hereafter referred to as 'Klipkraal 2') to conduct the Heritage Scoping Report that forms part of the Environmental Impact Assessment (EIA) and Environmental Management Plan (EMP) for the proposed construction of the Klipkraal Wind Energy Facility (WEF), BESS and associated infrastructure near the towns of Beaufort West and Fraserburg in the Northern Cape Province of South Africa. In turn Banzai Environmental has been commissioned to conduct the Palaeontological Impact Assessment (PIA) for the Klipkraal Wind Energy Facility 1. In accordance with the National Environmental Management Act 107 of 1998 (NEMA) and to comply with the National Heritage Resources Act (No 25 of 1999, section 38) (NHRA), this PIA is necessary to confirm if fossil material could potentially be present in the planned development area, to evaluate the potential impact of the proposed development on the Palaeontological Heritage and to mitigate possible damage to fossil resources.

The proposed wind farms make up a larger wind energy facility (WEF) (with associated BESS) which will be referred to as the Klipkraal WEF, consisting of up to five (5) phases, with a combined generation capacity of up to approximately 1 500 MW, as follows:

- Klipkraal Wind Energy Facility 1: up to 300MW + BESS
- Klipkraal Wind Energy Facility 2: up to 300MW + BESS (part of a separate EIA process which forms part of separate application)
- Klipkraal Wind Energy Facility 3: up to 300MW + BESS (part of a separate EIA process which forms part of separate application) (this application)
- Klipkraal Wind Energy Facility 4: up to 300MW + BESS (part of a separate EIA process which forms part of separate application)

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• Klipkraal Wind Energy Facility 5: up to 300MW + BESS (part of a separate EIA process which

forms part of separate application)

• Klipkraal On-site Switching / Collector Substation and associated 132kV/400kV Power Line

(part of a separate BA application).

The proposed Klipkraal WEF 3 is depicted on the 3220 Sutherland (1983) Geological Map (Council of

Geoscience, Pretoria). This map indicates that the development is underlain by a small portion of Jurassic Dolerite while the rest of the footprint is underlain by the Teekloof Formation of the Adelaide

Subgroup (Beaufort Group, Karoo Supergroup). The PalaeoMap of the South African Heritage

Resources Information System indicates that the Palaeontological Sensitivity of the development is

unknown (Almond and Pether, 2009; Almond et al., 2013). Updated Geology (Council of Geosciences,

Pretoria) refines the geology of the 1983 Geological Map and indicates that the Klipkraal WEF 3 is

underlain by the Middleton and Balfour Formation (Adelaide Subgroup, Beaufort Group.

In the last few decades extensive research and collecting have been conducted by palaeontologists in

this part of the basin and the Fraserburg area was found to be highly fossiliferous. A three day-site-

specific field survey of the development footprint was conducted on foot 24-26 September 2021. Various

fossiliferous sites, where fossils were found to be well-preserved, has been identified in the

development footprint.

As the site visit was conducted in 2021 the layout of the WEF was not yet known. The specific layout

of the Klipkraal WEF 3 development was thus not investigated in detail. It is thus recommended that a

Palaeontological Walkdown of the development is conducted pre-construction once the final design

details are available. The appointed Palaeontologist will also have to include a Chance Find Protocol

for the Klipkraal WEF 3 development and training of accountable supervisory personnel by a qualified

palaeontologist in the recognition of fossil heritage is necessary.

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# NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) AND ENVIRONMENTAL IMPACT REGULATIONS, 2014 (AS AMENDED) - REQUIREMENTS **FOR SPECIALIST REPORTS (APPENDIX 6)**

Regula Appen	tion GNR 326 of 4 December 2014, as amended 7 April 2017,	Section of Report
1. (1) A a)	specialist report prepared in terms of these Regulations must contain- details of-	Section 1, Appendix B
	i. the specialist who prepared the report; and	
	ii. the expertise of that specialist to compile a specialist report	
	including a curriculum vitae;	
b)	a declaration that the specialist is independent in a form as may be	Section 1
	specified by the competent authority;	
c)	an indication of the scope of, and the purpose for which, the report	Section 1
	was prepared;	
	(cA) an indication of the quality and age of base data used for the	Section 5
	specialist report;	
	(cB) a description of existing impacts on the site, cumulative impacts	Section 7
	of the proposed development and levels of acceptable change;	
d)	the date and season of the site investigation and the relevance of the	Section 1 and 9
	season to the outcome of the assessment;	
e)	a description of the methodology adopted in preparing the report or	Section 1
	carrying out the specialized process inclusive of equipment and	
	modelling used;	
f)	details of an assessment of the specific identified sensitivity of the site	Section 5
	related to the proposed activity or activities and its associated	
	structures and infrastructure, inclusive of a site plan identifying site	
	alternatives;	
g)	an identification of any areas to be avoided, including buffers;	Section 1 and 9
h)	a map superimposing the activity including the associated structures	Section 5
	and infrastructure on the environmental sensitivities of the site	
	including areas to be avoided, including buffers;	
		<u> </u>

i) a description of any assumptions made and any uncertainties or gaps in knowledge;	Section 2
<ul> <li>j) a description of the findings and potential implications of such findings on the impact of the proposed activity, (including identified alternatives on the environment) or activities;</li> </ul>	Section 1 and 9
k) any mitigation measures for inclusion in the EMPr;	Section 1 and 9
any conditions for inclusion in the environmental authorisation;	Section 1 and 9
m) any monitoring requirements for inclusion in the EMPr or environmental authorisation;	Section 1 and 9
n) a reasoned opinion-     i. (as to) whether the proposed activity, activities or portions thereof should be authorised;	Section 1 and 9
(iA) regarding the acceptability of the proposed activity or activities; and	
<li>ii. if the opinion is that the proposed activity, activities or portions thereof should be authorised, any avoidance, management and mitigation measures that should be included in the EMPr, and where applicable, the closure plan;</li>	
o) a description of any consultation process that was undertaken during the course of preparing the specialist report;	N/A
p) a summary and copies of any comments received during any consultation process and where applicable all responses thereto; and	N/A
q) any other information requested by the competent authority.	N/A
2) Where a government notice <i>gazetted</i> by the Minister provides for any protocol or minimum information requirement to be applied to a specialist report, the requirements as indicated in such notice will apply.	Section 4

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# PROPOSED CONSTRUCTION OF THE KLIPKRAAL WIND **ENERGY FACILITY 3, NEAR FRASERBURG, NORTHERN CAPE PROVINCE, SOUTH AFRICA**

# Palaeontological Impact Assessment

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# PROPOSED CONSTRUCTION OF THE KLIPKRAAL WIND ENERGY FACILITY 3, NEAR FRASERBURG, NORTHERN CAPE PROVINCE, SOUTH AFRICA

# Palaeontological Impact Assessment

# 1. INTRODUCTION

Aura Development Company (Pty) Ltd (hereafter referred to as 'Aura') are proposing to develop up to seven (7) wind farms and associated infrastructure [including substations and Battery Energy Storage Systems (BESS)] on a number of properties, majority being adjacent, near the towns of Beaufort West and Fraserburg in the Northern Cape Province of South Africa. The proposed wind farm projects will have maximum export capacities of up to approximately 200 megawatts (MW) respectively. The proposed wind farms make up a larger wind energy facility (WEF) (with associated BESS) which will be referred to as the Klipkraal WEF, consisting of up to seven (7) phases, with a combined generation capacity of up to approximately 1 400 MW, as follows:

The proposed wind farms make up a larger wind energy facility (WEF) (with associated BESS) which will be referred to as the Klipkraal WEF, consisting of up to five (5) phases, with a combined generation capacity of up to approximately 1 500 MW, as follows:

- Klipkraal Wind Energy Facility 1: up to 300MW + BESS
- Klipkraal Wind Energy Facility 2: up to 300MW + BESS (part of a separate EIA process which forms part of separate application) (this application)
- Klipkraal Wind Energy Facility 3: up to 300MW + BESS (part of a separate EIA process which forms part of separate application) (this application)
- Klipkraal Wind Energy Facility 4: up to 300MW + BESS (part of a separate EIA process which forms part of separate application)
- Klipkraal Wind Energy Facility 5: up to 300MW + BESS (part of a separate EIA process which forms part of separate application)
- Klipkraal On-site Switching / Collector Substation and associated 132kV/400kV Power Line (part of a separate BA application).

The overall objective of the development is to generate electricity by means of renewable energy technology capturing wind energy to feed into the National Grid.

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It is anticipated that the proposed Klipkraal WEF 1 will comprise sixty (60) wind turbines with a maximum total energy generation capacity of up to approximately 300MW. The electricity generated by the proposed WEF

development will be fed into the national grid via a 132kV/400kV overhead power line. A Battery Energy

Storage System (BESS) will be located next to the onsite 33/132kV substation. The storage capacity and type

of technology would be determined prior to construction.

In terms of the Environmental Impact Assessment (EIA) Regulations, which were published on 04 December

2014 [GNR 982, 983, 984 and 985) and amended on 07 April 2017 [promulgated in Government Gazette

40772 and Government Notice (GN) R326, R327, R325 and R324 on 7 April 2017], various aspects of the

proposed development are considered listed activities under GNR 327 and GNR 324 which may have an

impact on the environment and therefore require authorisation from the National Competent Authority (CA),

namely the Department of Environment, Forestry and Fisheries (DEFF), prior to the commencement of such

activities. Specialist studies have been commissioned to assess and verify the project under the new Gazetted

specialist protocols.

1.1 **Terms of Reference** 

The objective of a Palaeontological Impact Assessment (PIA) is to determine the impact of the development

on potential palaeontological material at the site.

According to the "SAHRA Archaeological, Palaeontological and Meteorite Unite (APM) Guidelines: Minimum

Standards for the Archaeological and Palaeontological Components of Impact Assessment Reports" the aims

of the PIA are: 1) to identify the palaeontological status of the exposed as well as rock formations just below

the surface in the development footprint 2) to estimate the palaeontological importance of the formations

3) to determine the impact on fossil heritage; and 4) to recommend how the developer ought to protect or

mitigate damage to fossil heritage.

The terms of reference of a PIA are as follows:

**General Requirements:** 

Adherence to the content requirements for specialist reports in accordance with Appendix 6 of the

EIA Regulations 2014, as amended;

Adherence to all applicable best practice recommendations, appropriate legislation and authority

requirements;

Submit a comprehensive overview of all appropriate legislation, guidelines;

Description of the proposed project and provide information regarding the developer and consultant

who commissioned the study,

Description and location of the proposed development and provide geological and topographical

maps

Provide palaeontological and geological history of the affected area.

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

#### 1.2 **Specialist Credentials**

This study has been conducted by Mrs. Elize Butler, palaeontologist of Banzai Environmental (Pty) Ltd. She has conducted approximately 400 palaeontological impact assessments for developments in the Free State, KwaZulu-Natal, Eastern, Central, and Northern Cape, Northwest, Gauteng, Limpopo, and Mpumalanga. She has an MSc (cum laude) in Zoology (specializing in Palaeontology) from the University of the Free State, South Africa and has been working in Palaeontology for more than twenty-nine years. She has experience in locating, collecting, and curating fossils, including exploration field trips in search of new localities in the Karoo Basin. She has been a member of the Palaeontological Society of South Africa (PSSA) since 2006 and has been conducting PIAs since 2014. Please see Appendix B.

#### 1.3 **Assessment Methodology**

The aim of a desktop study is to evaluate the possible risk to palaeontological heritage in the proposed development. This includes all trace fossils as well as all fossils in the proposed footprint. All possible information is consulted to compile a scoping report, and this includes the following: PalaeoMap of the South African Heritage Resources Information System (SAHRIS) (Almond et al, 2013; SAHRIS website), all Palaeontological Impact Assessment reports in the same area; aerial photos and Google Earth images, topographical and geological maps as well as scientific articles of specimens from the development area and Assemblage Zones.

2. ASSUMPTIONS AND LIMITATIONS

The focal point of geological maps is the geology of the area and the sheet explanations of the Geological

Maps were not meant to focus on palaeontological heritage. Many inaccessible regions of South Africa have

never been reviewed by palaeontologists and data is generally based on aerial photographs alone. Locality

and geological information of museums and universities databases have not been kept up to date or data

collected in the past have not always been accurately documented.

Comparable Assemblage Zones in other areas is also used to provide information on the existence of fossils

in an area which has not documented in the past. When using similar Assemblage Zones and geological

formations for Desktop studies it is generally assumed that exposed fossil heritage is present within the

footprint. A field-assessment has thus been conducted to improve the accuracy of the desktop assessment.

3. TECHNICAL DESCRIPTION

3.1 Project Location

Klipkraal WEF 3 is located about 35km south-east of Fraserburg, within the Karoo Hoogland Municipality in

the Northern Cape Province (Figure 1-3).

Klipkraal WEF 3 is located on the following farm portions:

• Remainder of the Farm Matjiesfontein No. 409 (RE/409)

Remainder of the Farm Klipfontein No. 447 (RE/447)

Portion 1 of the Farm Klipfontein No. 447 (1/447)

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Figure 1: Regional setting of the proposed Klipkraal 3 WEF

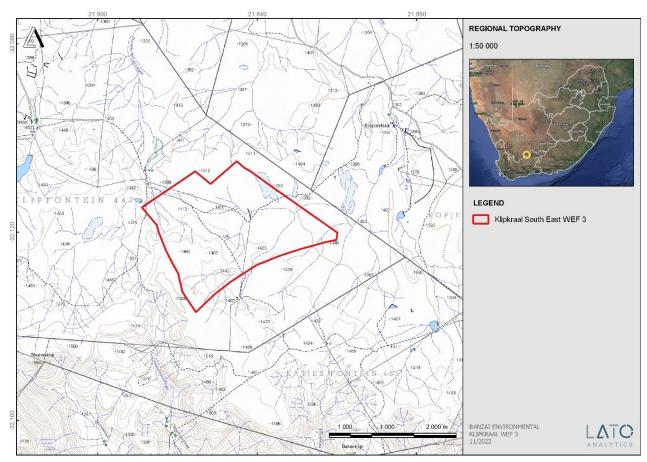


Figure 2:Locality Map of Klipkraal WEF3.

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Figure 3: General view over the proposed Klipkraal WEF 3 development.

#### 3.2 **Project Description**

It is anticipated that the proposed Klipkraal WEF 1 will comprise sixty (60) wind turbines with a maximum total energy generation capacity of up to approximately 300MW. The electricity generated by the proposed WEF development will be fed into the national grid via a 132kV overhead power line. The location of the BESS and substation will be confirmed during the EIA phase. The storage capacity and type of technology would be determined prior to construction. This information will be provided to I&AP's prior to the commencement of construction.

#### 3.2.1 Wind Farm Components

The proposed wind farm projects which form part of the larger Klipkraal WEF will each include the following components:

### Wind Turbines

Wind Energy Facility	Capacity	No. of turbines
1	300MW	60
2	300MW	60
3	300MW	60
4	300MW	60
5	300MW	60

- Approximately 60 turbines per wind farm, with a maximum export capacity of up to approximately 300MW for each wind farm. This will be subject to allowable limits in terms of the Renewable Energy Independent Power Producer Procurement Programme (REIPPPP) or any other program.
- Each wind turbine will have a maximum hub height of up to approximately 200m;
- Each wind turbine will have a maximum rotor diameter of up to approximately 200m;
- Permanent compacted hard standing areas / platforms (also known as crane pads) of approximately
- 100m x 100m (total footprint of approx. 410 000m2) per wind turbine during construction and for on- going maintenance purposes for the lifetime of the proposed wind farm projects. This will however depend on the physical size of the wind turbine;
- Each wind turbine will consist of a foundation (i.e., foundation rings) which may vary in depth, from approximately 3m and up to 10m or greater, depending on the physical size of each wind turbine. It should be noted that the foundation can be up to as much as approximately 700m<sup>3</sup>.

### 3.2.2 Electrical Transformers

- Electrical transformers will be constructed near the foot of each respective wind turbine in order to step up the voltage to 66kV.
- The typical footprint of the electrical transformers is up to approximately 10m x 10m but can be up to 20m x 20m at certain locations

# 3.2.3 Step-up/Collector Substations

- New 11-66/132-400kV step-up / collector substations, each occupying an area of up to approximately 2ha, for each wind farm being proposed [i.e., one (1) substation per phase].
- The proposed substations will include an Eskom portion and an Independent Power Producer (IPP)
  portion; hence the substations have been included in each respective wind farm EIA and in the grid
  connection infrastructure BA (substations, switching stations and power lines) to allow for handover
  to Eskom.
- Following construction, the substations will be owned and managed by Eskom. The current applicant will retain control of the medium voltage components (i.e., 33kV components) of the substations, while the high voltage components (i.e., 400kV components) of these substations will likely be ceded to Eskom shortly after the completion of construction.

# 3.2.4 Main Transmission Substations (MTS)

- Two (2) new 132/400kV Main Transmission Substations (MTS) are being proposed, occupying an area of up to approximately 120ha each.
- Each proposed MTS will include an Eskom portion and an IPP portion. However, a separate substation has also been included in each respective wind farm EIA and in the grid connection infrastructure BA to allow for handover to Eskom.
- Following construction, the substations will be owned and managed by Eskom. The current applicant
  will retain control of the 132-400kV and lower voltage components of each MTS, while the 132/400kV
  voltage components of each MTS will likely be ceded to Eskom shortly after the completion of
  construction.

### 3.2.5 Electrical Infrastructure

- The wind turbines will be connected to the proposed substations via medium voltage (i.e., 33kV)
  cables.
- These cables will be buried along access roads wherever technically feasible, however, the cables can also be overhead (if required);
- Each WEF will then connect to the MTS via a 400KV line.

3.2.6 Battery Energy Storage Systems (BESS)

• A Battery Energy Storage System (BESS) will be constructed for each respective wind farm [i.e., one

(1) BESS per phase] and will be located next to the 33-66/132-400kV step-up / collector substations

which form part of the respective wind farms, or in between the wind turbines.

• It is anticipated that the type of technology will be either Lithium Ion or Sodium-Sulphur (or as

determined prior to construction).

These batteries are not considered hazardous goods as they will be storing 'energy'.

• The size, storage capacity and type of technology will be determined / confirmed prior to construction.

3.2.7 Roads

Internal roads with a width of up to approximately 15m will provide access to each wind turb ne.

Existing site roads will be used wherever possible, although new site roads will be constructed where

necessary.

Existing site roads may also be upgraded using temporary concrete stones in order to accommodate

for the heavy loads.

Turns will have a radius of up to 50m for abnormal loads (especially turbine blades) to access the

various wind turbine positions.

3.2.8 Site Access

• The proposed wind farm application sites will be accessed via existing gravel roads from the R353

Regional Route.

3.2.9 Temporary Staging Areas

Temporary staging areas will be required for each wind farm and will be located both at the foot of each wind

turbine and at the storage facility (i.e., turbine development area) to allow for working requirements.

• One (1) temporary staging area per wind turbine / range of wind turbines will be required for each

wind farm (i.e., for each phase).

Temporary staging areas will cover an area of up to approximately 100m x 100m (10 000m² / 1ha)

each.

3.2.10 Temporary Construction Camps

Temporary construction camps will be required during the construction phase. One (1) temporary construction

camp per wind farm is being proposed [i.e., one (1) per phase].

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This area will be used as a permanent maintenance area during the operational phase. One (1) permanent Maintenance Area will be required per wind farm [i.e., one (1) per phase].

• Each combined Temporary Construction Camp / Permanent Maintenance Area will cover an area of

up to approximately 2.25ha.

A cement batching plant as well as a chemical storage area will fall within each Temporary

Construction Camp and Permanent Maintenance Area.

• Each Temporary Construction Camp and Permanent Maintenance Area will be strategically placed

around the proposed wind farm sites and will avoid all high sensitivity and/or 'no-go' areas.

3.2.11 Offices, Accommodation, a Visitors' Centre and Operation & Maintenance (O&M) Buildings

Offices (including ablution facilities), Accommodation (including ablution facilities), a Visitors' Centre and Operation & Maintenance (O&M) buildings will be required and will occupy areas of up to approximately 100m

x 100m (i.e., 1ha).

• Each wind farm (i.e., each phase) will have its own O&M building and Office, however, the

Accommodation and Visitors' Centre will be centralised locations which will be shared between

certain wind farm projects (i.e., shared between certain phases which will be confirmed at a later

stage).

3.2.12 Septic Tank and Soak-Away Systems

• Each wind farm will consist of septic tank and soak-away systems.

• This will be required for construction as well as long term use.

Septic tanks and soak-away systems will be placed 100m or more from water resource (which

includes boreholes).

3.2.13 Wind Measuring Lattice Masts

• Two (2) wind measuring lattice masts (approximately 120m in height) have already been strategically

placed within the wind farm application sites in order to collect data on wind conditions.

Two (2) additional wind measuring lattice masts may be installed within the wind farm application

sites. This will be confirmed at a later stage, prior to the respective application forms being submitted.

3.2.14 Fencing

Fencing will be required and will surround each respective wind farm.

A maximum height of 3m for the fencing is proposed. The area which the fencing will cover will be

confirmed during the detailed design phase, prior to construction commencing. The type of fencing to

be used will be either palisade or diamond/clear view/mesh.

 Fences will however be constructed according to specifications recommended by the Ecologist and Avifauna specialist (as per the EMPr).

# 3.2.15 Temporary Infrastructure to Obtain Water from Available Local Sources

- Temporary infrastructure to obtain water from available local sources will be required. Water may also
  be obtained from onsite boreholes and from the town of Fraserburg.
- New or existing boreholes, including a potential temporary above ground pipeline (approximately 50cm in diameter) for each wind farm, to feed water to the sites are being proposed.
- Water will potentially be stored in temporary water storage tanks.

# 3.2.16 Temporary Containers

- Temporary containers of up to approximately 80m³ will be required for the storage of fuel on-site during the construction phase of each wind farm.
- As mentioned, a chemical storage area will fall within the Temporary Construction Camp and permanent Maintenance Area.

# 3.3 Layout Alternatives

# 3.3.1 Wind Energy Facility

Design and layout alternatives will be considered and assessed as part of the EIA. These include alternatives for the Substation locations and also for the construction / laydown area.

### 3.3.2 No-go Alternative

The 'no-go' alternative is the option of not undertaking the proposed WEF project. Hence, if the 'no-go' option is implemented, there would be no development. This alternative would result in no environmental impacts from the proposed project on the site or surrounding local area. It provides the baseline against which other alternatives are compared and will be considered throughout the report.

Date: 26 November 2022

4. LEGAL REQUIREMENT AND GUIDELINES

National Heritage Resources Act (25 of 1999)

Cultural Heritage in South Africa, includes all heritage resources, is protected by the National Heritage Resources Act (Act 25 of 1999) (NHRA). Heritage resources as defined in Section 3 of the Act include "all objects recovered from the soil or waters of South Africa, including archaeological and

palaeontological objects and material, meteorites and rare geological specimens".

The identification, evaluation and assessment of any cultural heritage site, artefact or finds in the South African

context is required and governed by the following legislation:

National Environmental Management Act (NEMA) Act 107 of 1998

National Heritage Resources Act (NHRA) Act 25 of 1999

Minerals and Petroleum Resources Development Act (MPRDA) Act 28 of 2002

Notice 648 of the Government Gazette 45421- general requirements for undertaking an initial site

sensitivity verification where no specific assessment protocol has been identified.

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

heritage resources.

GNR 982 (Government Gazette 38282, 14 December 2014) promulgated under the National Environmental

Management Act (NEMA) Act 107 of 1998

Basic Assessment Report (BAR) – Regulations 19 and 23

Environmental Impacts Assessment (EIA) – Regulation 23

Environmental Scoping Report (ESR) – Regulation 21

Environmental Management Programme (EMPr) – Regulations 19 and 23

National Heritage Resources Act (NHRA) Act 25 of 1999

Protection of Heritage Resources – Sections 34 to 36

Heritage Resources Management – Section 38

The NEMA (No 107 of 1998) states that an integrated EMP should (23:2 (b)) "...identify, predict and evaluate

the actual and potential impact on the environment, socio-economic conditions and cultural heritage".

In agreement with legislative requirements, EIA rating standards as well as SAHRA policies the following

comprehensive and legally compatible PIA report have been compiled.

Palaeontological heritage is exceptional and non-renewable and is protected by the NHRA. Palaeontological

resources and may not be unearthed, broken moved, or destroyed by any development without prior

assessment and without a permit from the relevant heritage resources authority as per section 35 of the

NHRA.

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

- the construction of a road, wall, power line, pipeline, canal or other similar form of linear development or barrier exceeding 300 m in length.
- the construction of a bridge or similar structure exceeding 50 m in length.
- any development or other activity which will change the character of a site—
- (Exceeding 5 000 m<sup>2</sup> in extent; or
- involving three or more existing erven or subdivisions thereof; or
- involving three or more erven or divisions thereof which have been consolidated within the past five years; or
- the costs of which will exceed a sum set in terms of regulations by SAHRA or a provincial heritage resources authority
- the re-zoning of a site exceeding 10 000 m² in extent.
- or any other category of development provided for in regulations by SAHRA or a Provincial heritage resources authority.

# 5. DESCRIPTION OF THE RECEIVING ENVIRONMENT

The proposed Klipkraal WEF 3 is depicted on the 1: 250 000 Sutherland 3220 (1983) (Council of Geoscience, Pretoria) (**Figure 4, Table 1**). This map indicates that the development is underlain by a small portion of Jurassic Dolerite (Jd, red) while the rest of the footprint is underlain by the Teekloof Formation (Pte; green) of the Adelaide Subgroup (Beaufort Group, Karoo Supergroup). The PalaeoMap of the South African Heritage Resources Information System (**Figure 5**) indicates that the Palaeontological Sensitivity of the development is unknown (Almond and Pether, 2009; Almond *et al.*, 2013).

Updated Geology (Council of Geosciences, Pretoria; **Figure 6**) refines the geology of the 1983 Geological Map and indicates that the Klipkraal WEF 3 is underlain by the Middleton and Balfour Formation (Adelaide Subgroup, Beaufort Group.

The Jurassic dolerite present in the development form part of the Karoo Igneous Province is one of the worlds classic continental flood basalt (CFB) provinces. This Suite was formed approximately 183 million years ago and consists of intrusive and extrusive rocks that occur over a large area (Duncan et al, 2006). Generally, the flood basalts do not contribute to prominent volcanic structures but instead are formed by successive eruptions from a set of fissures that form sub-horizontal lava flows (sills and dikes) varying in thickness. This

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lava caps the landscape on which they erupted. As the Karoo is an old flood basalt province it is today preserved as erosional fragments of a more extensive lava cap that covered much of southern Africa in the geological past. It is estimated that the Karoo lava outcrop currently covered at least 140 000 km² while it was larger in the past [~2 000 000 km² (Cox 1970, 1972)]. The Karoo Igneous Province can be divided into the Lebombo and the Drakensberg Groups. This Igneous Province contains a large volume of flood basalts as well as silicic volcanic rocks. These units consist of hyodacite and rhyolitic magma and crops out along the Lebombo monocline. Individual units span up to 60 km and sometimes show massive pyroclastic structures and are thus classified as rheoignimbrites. The basal lavas lie conformably on the Clarens Formation but in specific localities, sandstone erosion occurred before the volcanic eruptions took place. Lock *et al* (1974) described evidence in the Eastern Cape that in the early stages of volcanism magma interacted with ground water to produce volcaniclastic deposits as well as phreatic and phreatomagmatic diatremes. Eales *et al* (1984) also found evidence of aqueous environments during early volcanism by the existence of pillow lavas and associated hyaloclastite breccias and thin lenses of fluviatile sandstones interbedded with the lowermost magmas.

Project Description: Proposed Construction of the Klipkraal WEF 3 – Palaeontological Impact Assessment Version No. 01

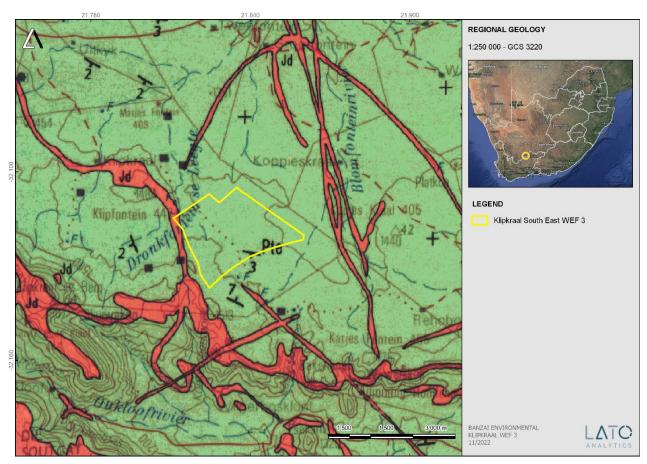
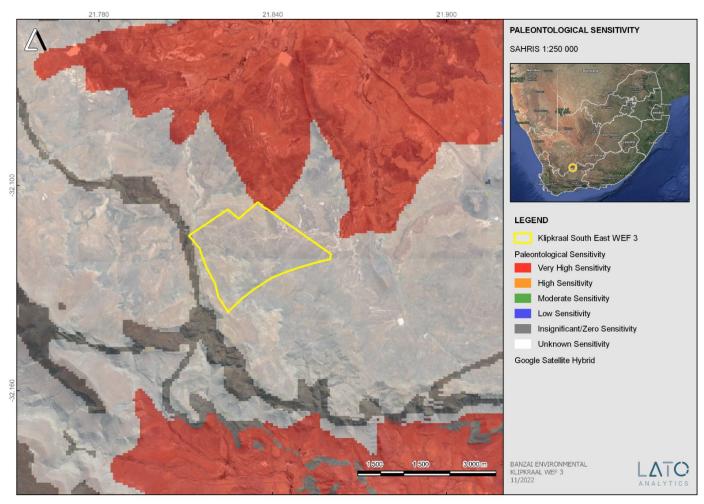


Figure 4:Extract of the 1:250 000 Sutherland 3220 (1983) Geological map (Council of Geoscience, Pretoria) indicating that the development is underlain by the Teekloof Formation (Pte; green) of the Adelaide Subgroup (Beaufort Group, Karoo Supergroup, while the most western margin is underlain by Jurassic dolerite (Jd, red).

Table 1:Legend of the 1:250 000 Sutherland 3220 (1983) Geological map (Council of Geoscience, Pretoria).

HIDAGGIG	1		(	rragier		
JURASSIC JURA						Jd Dolerite Doleriet
		GROEP BEAUFORT GROUP	Teekloof	Mudstone, siltstone, sandstone; sandstone-rich Poortjie Member at base Moddersteen, sliksteen, sandsteen; sandsteenryke Poortjielid aan basis	Pte	
	5	diloti	Ahrahamskraal (Pa)	Mudstone, silfstone, sandstone, thin cherty beds (lowermost red mudstone ———)  Moddersteen, sliksteen, sandsteen, dun chertagtige lae (onderste rooi moddersteen ———)		
PERMIAN	KAROO SEQUENC		Waterford (Pw)	Sandstone, siltstone, mudstone, shale Sandsteen, sliksteen, moddersteen, skalie	Pa Pw	
PERM	OPEENVOLGING K	GROEP ECCA	*Koedoesberg	Sandstone, siltstone, shale Sandsteen, sliksteen, skalie	Pko	
	OPEENV	GROUP	*Kookfontein	Shale, siltstone, thin sandstone beds Skalie, sliksteen, dun sandsteen lae	Pk	
			*Skoorsteenberg (Ps)	Sandstone, siltstone, shale Sandsteen, sliksteen, skalie	Ps	
			Tierberg	Shale Skalie	Pt	

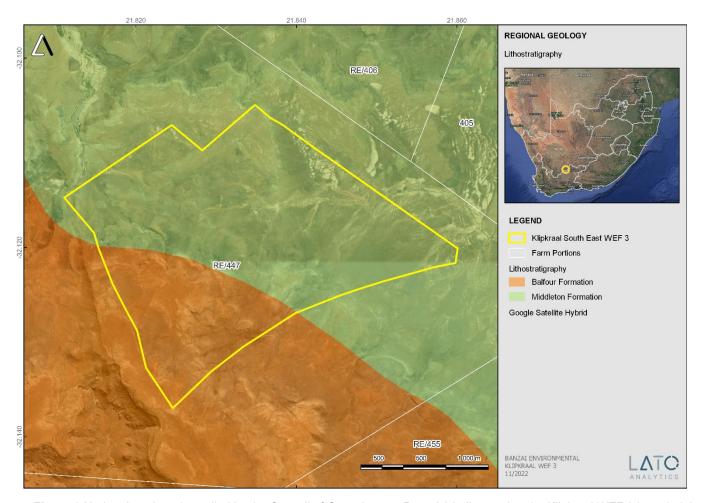
SiVEST Environmental Proposed Construction of the Klipkraal WEF 3 – Palaeontological Impact Assessment Version No. 01



*Figure 5*: Extract of the 1: 250 000 SAHRIS PalaeoMap (Council of Geosciences) indicating the proposed Klipkraal WEF 3 development.

Table 2:Palaeontological Sensitivity according to the SAHRIS PalaeoMap (Almond et al, 2013; SAHRIS website).

Colour	Sensitivity	Required Action
RED	VERY HIGH	field assessment and protocol for finds is required
ORANGE/YELLOW	HIGH	desktop study is required and based on the outcome of the desktop study; a field assessment is likely
GREEN	MODERATE	desktop study is required
BLUE	LOW	no palaeontological studies are required however a protocol for finds is required
GREY	INSIGNIFICANT/ZERO	no palaeontological studies are required
WHITE/CLEAR	UNKNOWN	these areas will require a minimum of a desktop study. As more information comes to light, SAHRA will continue to populate the map.



**Figure 6**:Updated geology (compiled by the Council of Geosciences, Pretoria) indicates that the Klipkraal WEF 3 is underlain by the Middleton and Balfour Formation (Adelaide Subgroup, Beaufort Group, Karoo Supergroup).

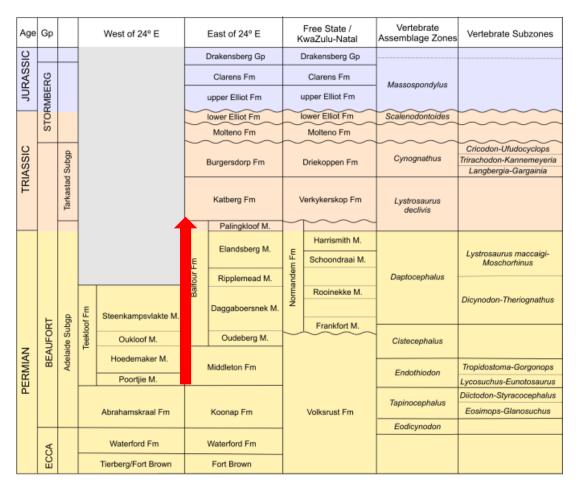


Figure 7: Vertebrate biozonation range chart for the Main Karoo Basin of South Africa.

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

Wavy lines indicate unconformities. (PLYCSR=Pelycosauria and MAMMFMES+Mammaliaformes. Gp=group, Subgp-Supbroup, Fm=Formation, M=Member. The proposed cemetery development is indication by the blue arrow

The Adelaide Subgroup is approximately 5 000 m thick in the southeast, but this decreases to about 800m in the centre of the basin which decreases to about 100 to 200m in the north. The Koonop Formation is about 1 300 m, Middleton 1 600 m and the Balfour Formation approximately 200 m thick. The Abrahamskraal Formation is about 2 500 m thick and the Teekloof Formation 1 000 m.

The Adelaide Subgroup contains alternating greyish-red, bluish-grey, or greenish grey mudrocks in the southern and central parts of the Karoo Basin with very fine to medium-grained, grey lithofeldspathic sandstones. In the northern Normandien formation the basin consists of course to very coarse sandstones and granulostones. Coarsening—upward cycles are present in the lower part of the Normandien Formation while the mudrocks and sandstone units usually form fining-upward cycles. These cycles are positioned on erosion surfaces which is overlain by a thin intraformational mud-pellet conglomerate and vary in thickness

from a few meters to tens of meters. Singular sandstone units could vary from 6m to 60m in the south thinning

northwards.

Thicker sandstones of the Adelaide are usually multi-storey and usually have cut-and-fill features. The

sandstones are characterized internally by horizontal lamination together with parting lineation and less

frequent trough crossbedding as well as current ripple lamination. The bases of the sandstone units are

extensive beds, while ripple lamination is usually confined to thin sandstones towards the top of the thicker

units.

The mudrocks of the Adelaide Subgroup usually have massive and blocky weathering apart from in the

Normandien and Daggaboersnek Member. Sometimes desiccation cracks and impressions of raindrops are

present. In the mudstones of the Beaufort Group calcareous nodules and concretions occur throughout.

The Lower Adelaide Subgroup consists of the following formations:

Abrahamskraal/Koonap Formation: Transitional brackish lacustrine to fluvial. Greenish-grey sandstones

grading upwards into fine-grained siltstones and mudstones.

Middleton Formation: Semi-arid climate supported a lush flora and fauna that thrived along meander belts

and semi-permanent lakes. Cyclic deposits of lenticular sandstone bodies grading into greenish-grey

mudstone. The thickest formation in this succession, constituting 37% of the Beaufort Group and 47% of the

Adelaide Subgroup. The formation has lenses of red mudstone which are likely to have been deposited in a

sub-aerial fluvial environment. The Middleton Formation (Adelaide Subgroup, Beaufort Group, Karoo

Supergroup) is biostratigraphically subdivided in the Cistecephalus and Endothiodon Assemblage Zones

(Figure 7; Smith and Botha, 2020). Vertebrate fossils known from the Middleton Formation include

amphibians, anapsids and therapsids (Smith et al 2020). Anapsid fossil diversity declines in the Middleton

Formation, while therapsid taxa (e.g., Dicynodontia and Gorgonopsia) show diversification in the

Cistecephalus and Endothiodon AZs (Rubidge 2005; Smith et al 2020). The Cistecephalus AZ is

characterized by the presence of numerous dicynodont species e.g. Diictodon, Pristerodon, Cistecephalus,

Aulacephalodon and Oudenodon. Plant fossils are also present in this formation and comprise of Glossopteris

and Schizoneura. The Eodicynodon and Tapinocephalus Assemblage Zones are present in the Kroonap

Formation. The Eodicynodon AZ is characterised by Eodicynodon and Tapinocaninus fossils. The

Tapinocephaus AZ has a rich diversity of Therapids, dinocephalia, while fish, amphibia and plant fossils are

also present.

5.1 **Additional Information Consulted** 

In compiling this report the following sources were consulted:

Geological map 1:100 000, Geology of the Republic of South Africa (Visser 1984)

A Google Earth map with polygons of the proposed development was obtained from SiVEST.

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1:250 000 Sutherland 3220 (1983) Geological map (Council of Geoscience, Pretoria).

# SITE VISIT

A site-specific field survey of the development footprint was conducted on foot and vehicle on 24-26 September 2021. The following photographs of the site was taken. Several weathered fossiliferous sites were identified during the site visit.

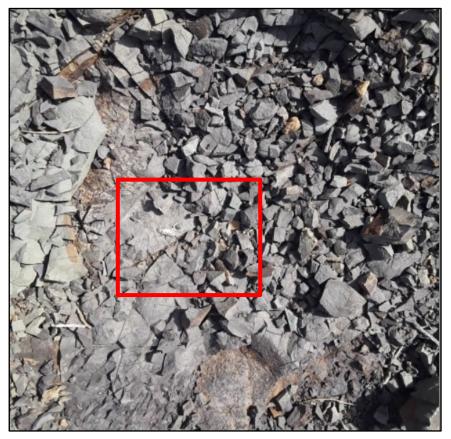


Figure 8:Fossilized bone fragment

GPS -32.122222, 21.830278



**Figure 9**: Weathered vertebral column. GPS -32.121944, 21.830000

# 7. SPECIALIST FINDINGS / IDENTIFICATION AND ASSESSMENT OF IMPACTS

#### 7.1 Planning / Pre construction

Table 3: Rating of impacts -Planning Phase

ENVIRONMENTAL PARAMETER	ISSUE / IMPACT / ENVIRONMENTAL EFFECT/ NATURE		E	ENVI				L SIGN			E	RECOMMENDED	ENVIRONMENTAL SIGNIFICANCE AFTER MITIGATION								CE
		E	Р	R	L	D		TOTAL	STATUS	(+ OR -)	s	MITIGATION MEASURES	E	P	R	L	D	I / M	TOTAL	STATUS	s
Planning Phase	Planning Phase																				
Loss of Fossil Heritage	No Impact.											No Impact									

#### 7.2 Construction

Table 4: Rating of impacts – Construction Phase

ENVIRONMENTA L PARAMETER	ISSUE / IMPACT / ENVIRONMENTA		E	ENVI				L SIGI	NIFICAN TION	ICE	RECOMMENDED	ENVIRONMENTAL SIGNIFICANCE AFTER MITIGATION								
	L EFFECT/ NATURE	E	P	R	L	D		TOTAL	STATUS (+ OR -)	S	MITIGATION MEASURES	E	Р	R	L	D	I / M	TOTAL	STATUS	s
Construction/ Deco	mmissioning Phase																			
Loss of Fossil Heritage	Damage, disturbance, destruction or	2	4	4	4	4	4	72	-	Very High	Palaeontological Walkdown is recommended	2	4	4	4	4	2	34	-	Medium

sealir	ng-in of		during the EIA		
legall	ly-protected,		phase.		
scien	ntifically		Medium. Most		
valua	able fossil		recorded fossil sites		
herita	age at or		can be effectively		
bene			mitigated by a		
grour	nd surface		professional		
	n the road		palaeontologist in		
	orint, mainly		the pre-construction		
	to ground		phase (recording /		
clear			collection). Newly		
	vations		exposed fossils can		
			be mitigated		
			through a Chance		
			Fossil Finds		
			Procedure.		
			However, residual		
			impacts following		
			mitigation may be		
			locally high, given		
			the unavoidable		
			difficulties of		
			identifying and		
			sampling fossils		
			from on-going		

				construction phase				
				excavations and				
				site clearance				

### 7.3 Operation

Table 5: Rating of impacts -Operational Phase

ENVIRONMENTAL	ISSUE / IMPACT /		E	ENVI				L SIGN		NCE	RECOMMENDED		E	NVI				L SIGN TIGATI	IIFICAN ON	ICE
PARAMETER ENVIRONMENTAL EFFECT/ NATURE		E	Р	R	L	D	/ M	TOTAL	STATUS	s	MITIGATION MEASURES	E	Р	R	L	D	/ M	TOTAL	STATUS	S
		Oper	atio	n Ph	ase															
Loss of Fossil Heritage	No Impact										No Impact									

### No go Impact 7.4

Table 6: Rating of impacts- No Go

		ENVIRONMENTAL SIGNIFICANCE						ENVIRONMENTAL SIGNIFICANCE								Ε						
ENVIRONMENTAL	ISSUE / IMPACT /		BEFORE MITIGATION					IITIGA		RECOMMENDED	AFTER MITIGATION											
PARAMETER	ENVIRONMENTAL						ı	L	SI	-		MITIGATION						ı	_	SN	-	
TANAMETER	EFFECT/ NATURE	E	Р	R	L	D	1	TA	ATL	9	S	MEASURES	E	Р	R	L	D	1	TA	ATL	d	S
							М	ĭ	ST	4								М	ĭ	ST	4	
No-Go	lo-Go																					

Loss of Fossil Heritage	N/A					N/A					

# 7.5 Cumulative Impacts

WEF's in the Klipkraal development area (35 km range) will have a Zero to Very High Palaeontological Sensitivity. However, it is important to note that the quality of preservation of these different sites will most probably vary and it is thus difficult to allocate a Cumulative Sensitivity to the projects. If all the mitigation measures are carried out, a conservative estimate of the Cumulative impacts on fossil Heritage will vary between Low and Medium.

# 7.6 Overall Impact Rating

The significance of the impact occurring will be negative very high before mitigation and negative medium after mitigation. Post mitigation the overall significance will be medium.

8. COMPARATIVE ASSESSMENT OF ALTERNATIVES

As the alternatives will have the same geology as the rest of the WEF development there is no difference in

the preference of the alternatives from a Palaeontological point of view.

8.1 No-Go Alternative

Consideration must be given to the 'no-go' option in the BA process. The "no-go" option assumes that the site

remains in its current state, i.e., there is no construction of the power line and associated infrastructure in the

proposed project area and the status quo would proceed.

9. CONCLUSION and Summary

9.1 Summary of Findings

The proposed Klipkraal WEF 3 is depicted on the 3220 Sutherland (1983) Geological Map (Council of

Geoscience, Pretoria). This map indicates that the development is underlain by a small portion of Jurassic

Dolerite while the rest of the footprint is underlain by the Teekloof Formation of the Adelaide Subgroup

(Beaufort Group, Karoo Supergroup). The PalaeoMap of the South African Heritage Resources Information

System indicates that the Palaeontological Sensitivity of the development is unknown (Almond and Pether,

2009; Almond et al., 2013). Updated Geology (Council of Geosciences, Pretoria) refines the geology of the

1983 Geological Map and indicates that the Klipkraal WEF 3 is underlain by the Middleton and Balfour

Formation (Adelaide Subgroup, Beaufort Group.

In the last few decades extensive research and collecting have been conducted by palaeontologists in this

part of the basin and the Fraserburg area was found to be highly fossiliferous. A three day-site-specific field

survey of the development footprint was conducted on foot 24-26 September 2021. Various fossiliferous sites,

where fossils were found to be well-preserved, has been identified in the development footprint.

As the site visit was conducted in 2021 the layout of the WEF was not yet known. The specific layout of the

Klipkraal WEF 3 development was thus not investigated in detail. It is thus recommended that a

Palaeontological Walkdown of the development is conducted when the layout of the roads and turbines have

been established. The appointed Palaeontologist will also have to include a Chance Find Protocol for the

Klipkraal WEF 2 development and training of accountable supervisory personnel by a qualified palaeontologist

in the recognition of fossil heritage is necessary.

In the last few decades extensive research and collecting have been conducted by palaeontologists in this

part of the basin and the Fraserburg area was found to be highly fossiliferous. A two day-site-specific field

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survey of the development footprint was conducted on foot 24-26 September 2021. Various fossiliferous sites, where fossils were found to be well-preserved, has been identified in the development footprint.

As the site visit was conducted in 2021 the layout of the WEF was not yet known. The specific layout of the Klipkraal WEF 3 development was thus not investigated in detail. It is thus recommended that a Palaeontological Walkdown of the development is conducted pre-construction once the final design details are available. The appointed Palaeontologist will also have to include a Chance Find Protocol for the Klipkraal WEF 3 development and training of accountable supervisory personnel by a qualified palaeontologist in the recognition of fossil heritage is necessary.

### 9.2 **Conclusion and Impact Statement**

The significance of the impact occurring will be negative very high before mitigation. The pre-construction Palaeontological walkdown will lower the Significance of the Impact to a Medium level.

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Appendix A: Impact Assessment Methodology

1 ENVIRONMENTAL IMPACT ASSESSMENT (EIA) METHODOLOGY

The Environmental Impact Assessment (EIA) Methodology assists in evaluating the overall effect of

a proposed activity on the environment. Determining of the significance of an environmental impact

on an environmental parameter is determined through a systematic analysis.

1.1 Determination of Significance of Impacts

Significance is determined through a synthesis of impact characteristics which include context and

intensity of an impact. Context refers to the geographical scale (i.e., site, local, national or global),

whereas intensity is defined by the severity of the impact e.g., the magnitude of deviation from

background conditions, the size of the area affected, the duration of the impact and the overall

probability of occurrence. Significance is calculated as shown in Table 1.

Significance is an indication of the importance of the impact in terms of both physical extent and

time scale, and therefore indicates the level of mitigation required. The total number of points

scored for each impact indicates the level of significance of the impact.

1.2 Impact Rating System

The impact assessment must take account of the nature, scale and duration of effects on the

environment and whether such effects are positive (beneficial) or negative (detrimental). Each

issue / impact is also assessed according to the various project stages, as follows:

Planning;

· Construction;

Operation; and

Decommissioning.

Where necessary, the proposal for mitigation or optimisation of an impact should be detailed. A

brief discussion of the impact and the rationale behind the assessment of its significance has also

been included.

The significance of Cumulative Impacts should also be rated (As per the Excel Spreadsheet

Template).

1.2.1 Rating System Used to Classify Impacts

The rating system is applied to the potential impact on the receiving environment and includes an

objective evaluation of the possible mitigation of the impact. Impacts have been consolidated into

one (1) rating. In assessing the significance of each issue, the following criteria (including an

allocated point system) is used:

Table 1: Rating of impacts criteria

## **ENVIRONMENTAL PARAMETER**

A brief description of the environmental aspect likely to be affected by the proposed activity (e.g. Surface Water).

### ISSUE / IMPACT / ENVIRONMENTAL EFFECT / NATURE

Include a brief description of the impact of environmental parameter being assessed in the context of the project. This criterion includes a brief written statement of the environmental aspect being impacted upon by a particular action or activity (e.g. oil spill in surface water).

## EXTENT (E)

This is defined as the area over which the impact will be expressed. Typically, the severity and significance of an impact have different scales and as such bracketing ranges are often required. This is often useful during the detailed assessment of a project in terms of further defining the determined.

PROPABILITY (B)						
4 International and National Will affect the entire country						
3	Province/region	Will affect the entire province or region				
2	Local/district	Will affect the local area or district				
1	Site	The impact will only affect the site				

### PROBABILITY (P)

This describes the chance of occurrence of an impact

1		•						
		The chance of the impact occurring is extremely low (Less than a						
1	Unlikely	25% chance of occurrence).						
		The impact may occur (Between a 25% to 50% chance of						
2	Possible	occurrence).						
		The impact will likely occur (Between a 50% to 75% chance of						
3	Probable	occurrence).						
		Impact will certainly occur (Greater than a 75% chance of						
4	Definite	occurrence).						
	DEVEDSIBILITY (D)							

### REVERSIBILITY (R)

This describes the degree to which an impact on an environmental parameter can be successfully reversed upon completion of the proposed activity.

	IDDEDLACEARLE LOSS OF RESOURCES (L)								
4	Irreversible	The impact is irreversible and no mitigation measures exist.							
3	Barely reversible	The impact is unlikely to be reversed even with intense mitigation measures.							
2	Partly reversible	The impact is partly reversible but more intense mitigation measures are required.							
1	Completely reversible	The impact is reversible with implementation of minor mitigation measures							
1		The impact is reversible with implementation of miner:							

## IRREPLACEABLE LOSS OF RESOURCES (L)

This describes the degree to which resources will be irreplaceably lost as a result of a proposed activity.

ł	DURATION (D)								
Ì	4 Complete loss of resources The impact is result in a complete loss of all resources.								
	3	Significant loss of resources	The impact will result in significant loss of resources.						
	2	Marginal loss of resource	The impact will result in marginal loss of resources.						
ĺ	1	No loss of resource.	The impact will not result in the loss of any resources.						

This describes the duration of the impacts on the environmental parameter. Duration indicates the lifetime of the impact as a result of the proposed activity.

Project Description: Proposed Construction of the Klipkraal WEF 3 - Palaeontological Impact Assessment Version No.

		Ten 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1				
		The impact and its effects will either disappear with mitigation or				
		will be mitigated through natural process in a span shorter than				
		the construction phase $(0 - 1 \text{ years})$ , or the impact and its effects				
		will last for the period of a relatively short construction period and				
		a limited recovery time after construction, thereafter it will be				
1	Short term	entirely negated $(0-2 \text{ years})$ .				
		The impact and its effects will continue or last for some time after				
		the construction phase but will be mitigated by direct human				
2	Medium term	action or by natural processes thereafter (2 – 10 years).				
		The impact and its effects will continue or last for the entire				
		operational life of the development, but will be mitigated by direct				
3	Long term	human action or by natural processes thereafter (10 – 50 years).				
		The only class of impact that will be non-transitory. Mitigation				
		either by man or natural process will not occur in such a way or				
		such a time span that the impact can be considered transient				
4	Permanent	(Indefinite).				
INTENSITY / MAGNITUDE (I / M)						
Desc	ribes the severity of an impact (i.e. wl	hether the impact has the ability to alter the functionality or quality of				

a system permanently or temporarily).

_		
1	Low	Impact affects the quality, use and integrity of the system/component in a way that is barely perceptible.
		Impact alters the quality, use and integrity of the
		system/component but system/ component still continues to
		function in a moderately modified way and maintains general
2	Medium	integrity (some impact on integrity).
		Impact affects the continued viability of the system/component
		and the quality, use, integrity and functionality of the system or
		component is severely impaired and may temporarily cease. High
3	High	costs of rehabilitation and remediation.
		Impact affects the continued viability of the system/component
		and the quality, use, integrity and functionality of the system or
		component permanently ceases and is irreversibly impaired
		(system collapse). Rehabilitation and remediation often
		impossible. If possible rehabilitation and remediation often
		unfeasible due to extremely high costs of rehabilitation and
4	Very high	remediation.

# SIGNIFICANCE (S)

Significance is determined through a synthesis of impact characteristics. Significance is an indication of the importance of the impact in terms of both physical extent and time scale, and therefore indicates the level of mitigation required. This describes the significance of the impact on the environmental parameter. The calculation of the significance of an impact uses the following formula:

Significance = (Extent + probability + reversibility + irreplaceability + duration) x magnitude/intensity.

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The summation of the different criteria will produce a non-weighted value. By multiplying this value with the magnitude/intensity, the resultant value acquires a weighted characteristic which can be measured and assigned a significance rating.

Points	Impact Significance Rating	Description
5 to 23	Negative Low impact	The anticipated impact will have negligible negative effects and will require little to no mitigation.
5 to 23	Positive Low impact	The anticipated impact will have minor positive effects.
24 to 42	Negative Medium impact	The anticipated impact will have moderate negative effects and will require moderate mitigation measures.
24 to 42	Positive Medium impact	The anticipated impact will have moderate positive effects.
43 to 61	Negative High impact	The anticipated impact will have significant effects and will require significant mitigation measures to achieve an acceptable level of impact.
43 to 61	Positive High impact	The anticipated impact will have significant positive effects.
62 to 80	Negative Very high impact	The anticipated impact will have highly significant effects and are unlikely to be able to be mitigated adequately. These impacts could be considered "fatal flaws".
62 to 80	Positive Very high impact	The anticipated impact will have highly significant positive effects.

APPENDIX B

CURRICULUM VITAE

**ELIZE BUTLER** 

PROFESSION: Palaeontologist

YEARS' EXPERIENCE: 30 years in Palaeontology
EDUCATION: B.Sc Botany and Zoology, 1988

University of the Orange Free State

B. Sc (Hons) Zoology, 1991

University of the Orange Free State

Management Course, 1991

University of the Orange Free State

M. Sc. Cum laude (Zoology), 2009

University of the Free State

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

**MEMBERSHIP** 

Palaeontological Society of South Africa (PSSA) 2006-currently

EMPLOYMENT HISTORY

Part time Laboratory assistant Department of Zoology & Entomology University of

the Free State Zoology 1989-1992

Part time laboratory assistant Department of Virology

University of the Free State Zoology 1992

Research Assistant National Museum, Bloemfontein 1993 – 1997

Principal Research Assistant National Museum, Bloemfontein

and Collection Manager 1998–2022

**TECHNICAL REPORTS** 

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

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

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

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

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

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

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

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

SiVEST Environmental Prepared by: Banzai Environmental Pty Ltd for SiVEST

Project Description: Proposed Construction of the Klipkraal WEF 3 – Palaeontological Impact Assessment Version No. 01

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

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

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

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

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

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

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

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

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

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

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

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

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

Butler, E. 2016. Recommendation from further Palaeontological Studies: Proposed Construction of the Heidedal filling station on Erf 16603, Heidedal Extension 24, Mangaung Local Municipality, Bloemfontein, Free State Province. Bloemfontein.

Butler, E. 2016. Recommended Exemption from further Palaeontological studies: Proposed Construction of the Gunstfontein Switching Station, 132kv Overhead Power Line (Single or Double Circuit) and ancillary infrastructure for the Gunstfontein Wind Farm Near Sutherland, Northern Cape Province. Savannah South Africa. Bloemfontein.

Butler, E. 2016. Palaeontological Impact Assessment of the proposed Galla Hills Quarry on the remainder of the farm Roode Krantz 203, in the Lukhanji Municipality, division of Queenstown, Eastern Cape Province. Bloemfontein.

Butler, E. 2016. Chris Hani District Municipality Cluster 9 water backlog project phases 3a and 3b: Palaeontology inspection at Tsomo WTW. Bloemfontein.

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

Butler, E. 2016. Palaeontological Impact Assessment of the proposed upgrading of the main road MR450 (R335) from Motherwell to Addo within the Nelson Mandela Bay Municipality and Sunday's River valley Local Municipality, Eastern Cape Province. Bloemfontein.

Butler, E. 2016. Palaeontological Impact Assessment construction of the proposed Metals Industrial Cluster and associated infrastructure near Kuruman, Northern Cape Province. Savannah South Africa. Bloemfontein.

Butler, E. 2016. Palaeontological Impact Assessment for the proposed construction of up to a 132kv power line and associated infrastructure for the proposed Kalkaar Solar Thermal Power Plant near Kimberley, Free State and Northern Cape Provinces. PGS Heritage. Bloemfontein.

Butler, E. 2016. Palaeontological Impact Assessment of the proposed development of two burrow pits (DR02625 and DR02614) in the Enoch Mgijima Municipality, Chris Hani District, Eastern Cape.

Butler, E. 2016. Ezibeleni waste Buy-Back Centre (near Queenstown), Enoch Mgijima Local Municipality, Eastern Cape. Bloemfontein.

Butler, E. 2016. Palaeontological Impact Assessment for the proposed construction of two 5 Mw Solar Photovoltaic Power Plants on Farm Wildebeestkuil 59 and Farm Leeuwbosch 44, Leeudoringstad, North West Province. Bloemfontein.

Butler, E. 2016. Palaeontological Impact Assessment for the proposed development of four Leeuwberg Wind farms and basic assessments for the associated grid connection near Loeriesfontein, Northern Cape Province. Bloemfontein.

Butler, E. 2016. Palaeontological impact assessment for the proposed Aggeneys south prospecting right project, Northern Cape Province. Bloemfontein.

Butler, E. 2016. Palaeontological impact assessment of the proposed Motuoane Ladysmith Exploration right application, KwaZulu Natal. Bloemfontein.

Butler, E. 2016. Palaeontological impact assessment for the proposed construction of two 5 MW solar photovoltaic power plants on farm Wildebeestkuil 59 and farm Leeuwbosch 44, Leeudoringstad, North West Province. Bloemfontein.

Butler, E. 2016: Palaeontological desktop assessment of the establishment of the proposed residential and mixed-use development on the remainder of portion 7 and portion 898 of the farm Knopjeslaagte 385 Ir, located near Centurion within the Tshwane Metropolitan Municipality of Gauteng Province. Bloemfontein.

Butler, E. 2017. Palaeontological impact assessment for the proposed development of a new cemetery, near Kathu, Gamagara local municipality and John Taolo Gaetsewe district municipality, Northern Cape. Bloemfontein.

Butler, E. 2017. Palaeontological Impact Assessment of The Proposed Development of The New Open Cast Mining Operations on The Remaining Portions Of 6, 7, 8 And 10 Of the Farm Kwaggafontein 8 In the Carolina Magisterial District, Mpumalanga Province. Bloemfontein.

Butler, E. 2017. Palaeontological Desktop Assessment for the Proposed Development of a Wastewater Treatment Works at Lanseria, Gauteng Province. Bloemfontein.

Butler, E. 2017. Palaeontological Scoping Report for the Proposed Construction of a Warehouse and Associated Infrastructure at Perseverance in Port Elizabeth, Eastern Cape Province.

Butler, E. 2017. Palaeontological Desktop Assessment for the Proposed Establishment of a Diesel Farm and a Haul Road for the Tshipi Borwa mine Near Hotazel, In the John Taolo Gaetsewe District Municipality in the Northern Cape Province. Bloemfontein.

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Butler, E. 2017. Palaeontological assessment of the proposed development of a 3000 MW Combined Cycle Gas Turbine (CCGT) in Richards Bay, Kwazulu-Natal. Bloemfontein.

Butler, E. 2017. Palaeontological Impact Assessment of the proposed development of the new open cast mining operations on the remaining portions of 6, 7, 8 and 10 of the farm Kwaggafontein 8 10 in the Albert Luthuli Local Municipality, Gert Sibande District Municipality, Mpumalanga Province. Bloemfontein.

Butler, E. 2017. Palaeontological Impact Assessment of the proposed mining of the farm Zandvoort 10 in the Albert Luthuli Local Municipality, Gert Sibande District Municipality, Mpumalanga Province. Bloemfontein.

Butler, E. 2017. Palaeontological Desktop Assessment for the proposed Lanseria outfall sewer pipeline in Johannesburg, Gauteng Province. Bloemfontein.

Butler, E. 2017. Palaeontological Desktop Assessment of the proposed development of open pit mining at Pit 36W (New Pit) and 62E (Dishaba) Amandelbult Mine Complex, Thabazimbi, Limpopo Province. Bloemfontein.

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### **APPENDIX C: SITE SENSITIVITY VERIFICATION**

### **CONTENTS**

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## 1 **INTRODUCTION**

Aura Development Company (Pty) Ltd (hereafter referred to as 'Aura') are proposing to develop up to seven (7) wind farms and associated infrastructure [including substations and Battery Energy Storage Systems (BESS)] on a number of properties, majority being adjacent, near the towns of Beaufort West and Fraserburg in the Northern Cape Province of South Africa. The proposed wind farm projects will have maximum export capacities of up to approximately 200 megawatts (MW) respectively. The proposed wind farms make up a larger wind energy facility (WEF) (with associated BESS) which will be referred to as the Klipkraal WEF, consisting of up to seven (7) phases, with a combined generation capacity of up to approximately 1 400 MW, as follows:

The proposed wind farms make up a larger wind energy facility (WEF) (with associated BESS) which will be referred to as the Klipkraal WEF, consisting of up to five (5) phases, with a combined generation capacity of up to approximately 1 500 MW, as follows:

- Klipkraal Wind Energy Facility 1: up to 300MW + BESS
- Klipkraal Wind Energy Facility 2: up to 300MW + BESS (part of a separate EIA process which forms part of separate application)
- Klipkraal Wind Energy Facility 3: up to 300MW + BESS (part of a separate EIA process which forms part of separate application) (this application)
- Klipkraal Wind Energy Facility 4: up to 300MW + BESS (part of a separate EIA process which forms part of separate application)
- Klipkraal Wind Energy Facility 5: up to 300MW + BESS (part of a separate EIA process which forms part of separate application)
- Klipkraal On-site Switching / Collector Substation and associated 132kV/400kV Power Line (part of a separate BA application).

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Project Description: Proposed Construction of the Klipkraal WEF 3 – Palaeontological Impact Assessment Version No. 01

The overall objective of the development is to generate electricity by means of renewable energy technology capturing wind energy to feed into the National Grid.

It is anticipated that the proposed Klipkraal WEF 1 will comprise sixty (60) wind turbines with a maximum total energy generation capacity of up to approximately 300MW. The electricity generated by the proposed WEF development will be fed into the national grid via a 132kV/400kV overhead power line. A Battery Energy Storage System (BESS) will be located next to the onsite 33/132kV substation. The storage capacity and type of technology would be determined prior to construction.

Klipkraal WEF 3 is located about 35km south-east of Fraserburg, within the Karoo Hoogland Municipality in the Northern Cape Province (**Figure S1-S2**).

Klipkraal WEF 3 is located on the following farm portions:

- Remainder of the Farm Matjiesfontein No. 409 (RE/409)
- Remainder of the Farm Klipfontein No. 447 (RE/447)
- Portion 1 of the Farm Klipfontein No. 447 (1/447)

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**Date**: 26 November 2022



Figure S1: Regional setting of the proposed Klipkraal 3 WEF

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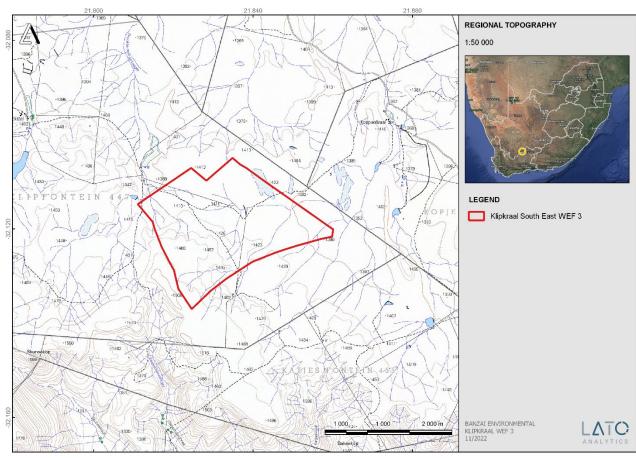


Figure S2: Locality Map of Klipkraal WEF3.

In terms of the National Environmental Management Act (Act 107 of 1998, as amended) (NEMA) Environmental Impact Assessment (EIA) Regulations [4 December 2014, Government Notice (GN) R982, R983, R984 and R985, as amended], various aspects of the proposed developments may have an impact on the environment and are considered to be listed activities. These activities require authorisation from the National Competent Authority (CA), namely the Department of Forestry, Fisheries and the Environment (DFFE), prior to the commencement thereof. Further to this as per GN R. 2313: Adoptions of the standard for the development and expansion of powerlines and substation with identified geographical areas and the exclusion of this infrastructure from the requirements to obtain Environmental Authorisation , the Standard was adopted in terms of section 24(10)(a) of the Act for the purpose of excluding the activities contemplated in paragraph 5.1 and 5.2 of the Schedule from the requirement to obtain environmental authorisation prior to commencement. In terms of the procedural requirement set out in the standard, screening tool reports have been undertaken for the grid corridor and associated infrastructure and site sensitivity verifications have been undertaken by the relevant specialists in accordance with the sensitivity themes. As per 6.1. of the GNR .2313, "Where any part of the infrastructure occurs on an area for which the environmental sensitivity for any environmental theme is identified as being very high or high by the national web based environmental screening tool and confirmed to be such through the application of the procedures

set out in the Standard", the site sensitivity verifications have been performed as per the procedural requirements set out.

In accordance with GN 320 and GN 1150 (20 March 2020)1 of the NEMA EIA Regulations of 2014 (as amended), prior to commencing with a specialist assessment, a site sensitivity verification must be undertaken to confirm the current land use and environmental sensitivity of the proposed project areas as identified by the National Web-Based Environmental Screening Tool (i.e., Screening Tool). Elize Butler, as palaeontology specialist, have been commissioned to verify the sensitivity of the project sites under these specialist protocols.

<sup>1</sup> GN 320 (20 March 2020): Procedures for The Assessment and Minimum Criteria for Reporting on Identified Environmental Themes in terms of Sections 24(5)(A) and (H) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation

### 2 SITE SENSITIVITY VERIFICATION METHODOLOGY

The following information sources were consulted to compile this report:

The Palaeontology Sensitivity Verification was undertaken by the following methodology:

- The site sensitivity is established through the National Environmental Web-Based Screening Tool
- The Site is mapped on the relevant Geological Map to determine the underlying geology of the development
- Then the site is mapped on the South African Heritage Resources Information System (SAHRIS) PalaeoMap, and the Sensitivity of the proposed development established.
- Other information is obtained by using satellite imagery and
- Palaeontological Impact Assessments and Desktop Assessments of projects in the same area are studied.
- A site investigation was conducted for this project

### **OUTCOME OF SITE SENSITIVITY VERIFICATION** 3

The proposed Klipkraal WEF 3 is depicted on the 1: 250 000 Sutherland 3220 (1983) (Council of Geoscience, Pretoria) (Figure S3). This map indicates that the development is underlain by a small portion of Jurassic Dolerite (Jd, red) while the rest of the footprint is underlain by the Teekloof Formation (Pte; green) of the Adelaide Subgroup (Beaufort Group, Karoo Supergroup). The PalaeoMap of the South African Heritage

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<sup>&</sup>lt;sup>1</sup> GN 320 (20 March 2020): Procedures for The Assessment and Minimum Criteria for Reporting on Identified Environmental Themes in terms of Sections 24(5)(A) and (H) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation

Resources Information System (Figure S4) indicates that the Palaeontological Sensitivity of the development is unknown (Almond and Pether, 2009; Almond et al., 2013).

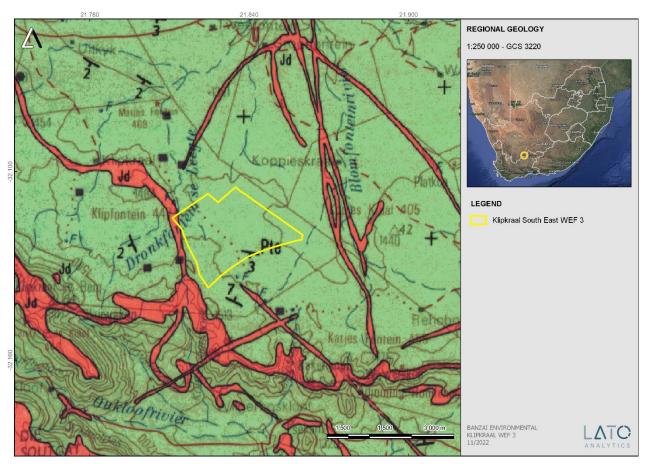


Figure S3 :Extract of the 1:250 000 Sutherland 3220 (1983) Geological map (Council of Geoscience, Pretoria) indicating that the development is underlain by the Teekloof Formation (Pte; green) of the Adelaide Subgroup (Beaufort Group, Karoo Supergroup, while the most western margin is underlain by Jurassic dolerite (Jd, red).

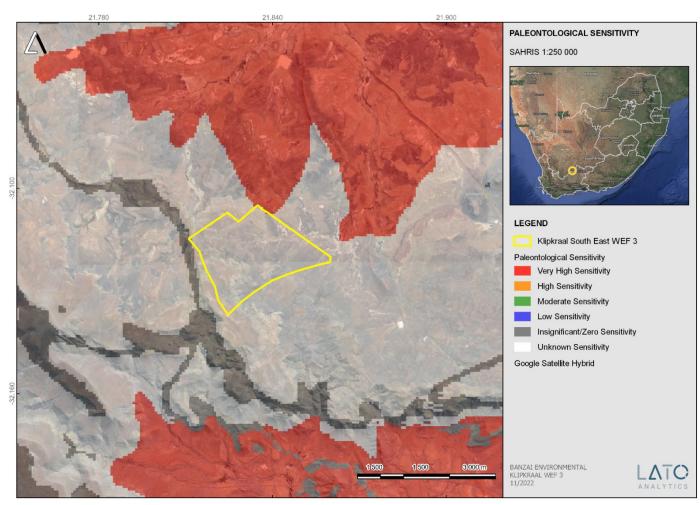


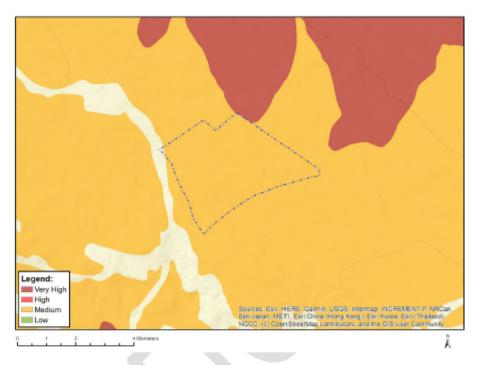
Figure S4: Extract of the 1: 250 000 SAHRIS PalaeoMap (Council of Geosciences) indicating the proposed Klipkraal WEF 3 development.

The SAHRIS Palaeomap indicates that the Palaeontological Sensitivity of the proposed development is underlain by sediments with a Zero to Very High (red) Palaeontological Sensitivity.

Table S1: Palaeontological Sensitivity according to the SAHRIS PalaeoMap (Almond et al, 2013; SAHRIS website).			
Colour	Sensitivity	Required Action	
RED	VERY HIGH	field assessment and protocol for finds is required	
ORANGE/YELLOW	HIGH	desktop study is required and based on the outcome of the desktop study; a field assessment is likely	
GREEN	MODERATE	desktop study is required	
BLUE	LOW	no palaeontological studies are required however a protocol for finds is required	
GREY	INSIGNIFICANT/ZERO	no palaeontological studies are required	
WHITE/CLEAR	UNKNOWN	these areas will require a minimum of a desktop study. As more information comes to light, SAHRA will continue to populate the map.	

The PalaeoMap of the South African Heritage Resources Information System (Figure S4, Table S1) indicates that the Palaeontological Sensitivity of the Jurassic Dolerite is Zero as it is igneous in origin and thus unfossiliferous while that of the Adelaide Subgroup is Very High (Almond and Pether, 2009; Almond et al., 2013). Large areas in the development are underlain by white that indicates that these areas have not been allocated so a specific Palaeontological Sensitivity.

## MAP OF RELATIVE PALEONTOLOGY THEME SENSITIVITY



Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
X			

## Sensitivity Features:

Sensitivity	Feature(s)
Medium	Features with a Medium paleontological sensitivity
Very High	Features with a Very High paleontological sensitivity

Figure S3: Palaeontological Sensitivity of the Klipkraal WEF 3 generated by the National Environmental Webbases Screening Tool.

The National Environmental Web-based Screening Tool indicates that the Palaeontological Sensitivity of the development is Very High (dark red) to Medium (orange).

## 4 CONCLUSION

The Site Sensitivities of the proposed Klipkraal WEF 3 has been verified and it was found that:

The SAHRIS Palaeosensitivity map indicates that the Palaeontological Sensitivity of the development is Very High to unknown.

And

The National Environmental Web-based Screening Tool indicates that the Palaeontological Sensitivity of the development is Very High (dark red) to Medium (orange).

These maps indicate that the proposed WEF development is highly Sensitive from a Palaeontological point of view. A site investigation in the spring of 2021 uncovered various fossiliferous sites, where fossils were found to be well-preserved. This classification is thus confirmed to be accurate (National Environmental Webbases Screening Tool and SAHRIS) as far as the impact of the Klipkraal WEF 3 is concerned, based on actual conditions recorded on the ground during the site visit in the spring of 2022.