

BASIC ASSESSMENT REPORT

Appendix D.4: Desktop Palaeontological Impact Assessment

PALAEONTOLOGICAL IMPACT ASSESSMENT:

**Basic Assessment for the proposed transmission
lines connecting the Kenhardt Solar Photovoltaic
Facilities PV 1, PV 2 and PV 3 on Onder Rugzeer
Farm 168 to the Nieuwehoop Substation on
Gemsbok Bult 120, north-east of Kenhardt, Northern
Cape Province**

Report prepared for:

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March 2016

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Basic Assessment for the Proposed Development of a Transmission Line and associated electrical infrastructure (KENHARDT PV 1 - TRANSMISSION LINE): BASIC ASSESSMENT REPORT

SPECIALIST EXPERTISE

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 and Madagascar. 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 numerous palaeontological impact assessments for developments and conservation areas in the Western, Eastern and Northern Cape, Free State, Northwest, Mpumalanga and Gauteng under the aegis of his Cape Town-based company *Natura Viva* cc. He was 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 APHAP (Association of Professional Heritage Assessment Practitioners – Western Cape).

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SPECIALIST DECLARATION

I, Dr John Edward Almond, as the appointed independent specialist, in terms of the 2014 EIA Regulations, hereby declare that I:

- I act as the independent specialist in this application;
- I perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- regard the information contained in this report as it relates to my specialist input/study to be true and correct, and do not have and will not have any financial interest in the undertaking of the activity, other than remuneration for work performed in terms of the NEMA, the Environmental Impact Assessment Regulations, 2014 and any specific environmental management Act;
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting the specialist report relevant to this application, 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 have no, and will not engage in, conflicting interests in the undertaking of the activity;
- I have no vested interest in the proposed activity proceeding;
- 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 have ensured that information containing all relevant facts in respect of the specialist input/study was distributed or made available to interested and affected parties and the public and that participation by interested and affected parties was facilitated in such a manner that all interested and affected parties were provided with a reasonable opportunity to participate and to provide comments on the specialist input/study;
- I have ensured that the comments of all interested and affected parties on the specialist input/study were considered, recorded and submitted to the competent authority in respect of the application;
- all the particulars furnished by me in this specialist input/study are true and correct; and
- I realize that a false declaration is an offence in terms of regulation 48 and is punishable in terms of section 24F of the Act.

Signature of the specialist:



Name of Specialist: Dr John Edward Almond

Date: 29 January 2016

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EXECUTIVE SUMMARY

Scatec Solar SA 330, 350 and 370 (PTY) Ltd is proposing to develop three 75 MW Solar Photovoltaic (PV) Facilities (i.e. Kenhardt PV 1, PV 2 and PV 3) on the remaining extent of Onder Rugzeer Farm 168, situated c. 20 km north-east of Kenhardt, Northern Cape. The associated electrical infrastructure (i.e. transmission lines) that will support the Kenhardt PV Facilities are being assessed as part of a Basic Assessment Process. The following proposed transmission line and electrical infrastructure connectivity options have been considered in the Basic Assessment Process:

- Each PV facility will be connected by a separate short 132 kV transmission line to the Eskom Nieuwehoop Substation that is currently being constructed on Farm Gembok Bult (remaining extent of Portion 3 of Farm 120); or
- Connect the Kenhardt PV 2 and Kenhardt PV 3 projects via separate 22/33 kV transmission lines to the proposed Kenhardt PV 1 on-site substation which will link via a 132 kV line to the Eskom Nieuwehoop Substation; or
- Construct one 132 kV transmission line from the Kenhardt PV 1 project to the Eskom Nieuwehoop Substation and connect the Kenhardt PV 2 and Kenhardt PV 3 facilities together via medium voltage transmission lines to either the on-site substation of Kenhardt PV 2 or PV 3, followed by the construction of one 132 kV transmission line from the on-site substation to the Eskom Nieuwehoop Substation.

The above connectivity options occur within an electrical infrastructure corridor.

This present report provides a Palaeontological Impact Assessment of each of the proposed new transmission lines (to support each proposed Kenhardt PV facility), as part of the required Basic Assessment Process.

The corridor for the proposed 132 kV and 33 kV/22 kV transmission lines are underlain at depth by Precambrian basement rocks (c. 1-2 billion years old) assigned to the Namaqua-Natal Province. These ancient igneous and high-grade metamorphic rocks - mainly granites and gneisses of the Keimoes Suite and Jacomynspan Group - crop out at surface in small areas and are entirely unfossiliferous. A large proportion of the basement rocks are mantled by a range of superficial sediments of Late Caenozoic age that may contain sparse fossil remains. These predominantly thin, unconsolidated deposits include small patches of calcretes, gravelly to sandy river alluvium, pan sediments, surface gravels, colluvium (scree) as well as Pleistocene to Recent wind-blown sands of the Gordonia Formation (Kalahari Group). Most of these younger rock units are of widespread occurrence and low palaeontological sensitivity. Scientifically important vertebrate fossil remains (e.g. Pleistocene mammalian bones and teeth) have been recorded within older stratified pan and river sediments elsewhere in the Bushmanland region where they are often associated with stone artefacts, while a limited range of trace fossils (e.g. plant root casts, termitaria and other invertebrate burrows) may be found within calcrete horizons.

No previously recorded areas or sites of exceptional fossil heritage sensitivity or significance have been identified within the Kenhardt PV project area as a whole, including the transmission line corridor. Due to (1) the inferred scarcity of scientifically important fossil remains within the study areas, as well as (2) the small scale of excavations for electrical pylon footings concerned, the overall impact significance of the construction phase of each of the transmission lines is assessed as VERY LOW (before and after mitigation). This applies equally to all 132 kV and 33 kV/22 kV transmission lines under consideration. No significant

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impacts on fossil heritage are anticipated during the operational and decommissioning phases of the proposed transmission lines. The potentially fossiliferous sedimentary rock units represented within the study area (e.g. Gordonia aeolian sands, calcrete) are of widespread occurrence and this is also likely to apply to most of the fossils they contain. It is concluded that the cumulative impacts on fossil heritage resource posed by the transmission lines/corridor, in the context of several alternative energy and other infrastructural developments planned in the region (as explained in the BA Report), is of very low significance. There are no fatal flaws in the proposed developments, nor are there objections to their authorisation as far as fossil heritage conservation is concerned, since significant impacts on scientifically valuable fossils or fossil sites are not anticipated here. The no-go option (no transmission lines) will have a neutral impact on local palaeontological heritage resources. The only proposed condition to accompany environmental authorisation is that the recommendations for monitoring and mitigation included in the EMPr are fully complied with.

Given the low palaeontological sensitivity of the eastern Bushmanland region, as determined from desktop and field-based studies, as well as the inferred very low impact significance of the proposed 132 kV and 33 kV/22 kV transmission lines for fossil heritage conservation, no specialist palaeontological monitoring or mitigation is recommended here, pending the discovery of substantial new fossil remains during construction. During the construction phase all substantial bedrock excavations should be monitored for fossil material by the responsible Environmental Control Officer. Should significant fossil remains - such as vertebrate bones and teeth, plant-rich fossil lenses, petrified wood or dense fossil burrow assemblages - be exposed during construction, the responsible Environmental Control Officer should safeguard these, preferably *in situ*. The South African Heritage Resources Authority (SAHRA), should be alerted as soon as possible (Contact details: Mrs Colette Scheermeyer, P.O. Box 4637, Cape Town 8000, Tel: 021 462 4502, Email: cscheermeyer@sahra.org.za), so that appropriate action can be taken by a professional palaeontologist, at the developer's expense. Mitigation would normally involve the scientific recording and judicious sampling or collection of fossil material as well as associated geological data (e.g. stratigraphy, sedimentology, taphonomy) by a professional palaeontologist. The palaeontologist concerned with mitigation work will need a valid fossil collection permit from SAHRA and any material collected would have to be curated in an approved depository (e.g. museum or university collection). These recommendations should be included within the Environmental Management Programmes for the proposed transmission line developments.

For the purposes of this report the entire proposed transmission line corridor was assessed from a palaeontological impact point of view. The applicant is free to select any area within the surveyed area (i.e. the corridor) to construct the transmission lines, provided that the recommended mitigation measures are implemented as applicable.

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Basic Assessment for the Proposed Development of a Transmission Line and associated electrical infrastructure (KENHARDT PV 1 - TRANSMISSION LINE): BASIC ASSESSMENT REPORT

COMPLIANCE WITH THE APPENDIX 6 OF THE 2014 EIA REGULATIONS

Requirements of Appendix 6 – GN R982	Addressed in the Specialist Report
1. (1) A specialist report prepared in terms of these Regulations must contain-	
a) details of- <ul style="list-style-type: none"> i. the specialist who prepared the report; and ii. the expertise of that specialist to compile a specialist report including a curriculum vitae; 	Preliminary Section of this Report
b) a declaration that the specialist is independent in a form as may be specified by the competent authority;	Appendix I of the BA Report and Section 1.1.6 of this Report
c) an indication of the scope of, and the purpose for which, the report was prepared;	Section 1.1
d) the date and season of the site investigation and the relevance of the season to the outcome of the assessment;	Not Applicable
e) a description of the methodology adopted in preparing the report or carrying out the specialised process;	Section 1.1
f) the specific identified sensitivity of the site related to the activity and its associated structures and infrastructure;	Section 1.3
g) an identification of any areas to be avoided, including buffers;	Not Applicable
h) a map superimposing the activity including the associated structures and infrastructure on the environmental sensitivities of the site including areas to be avoided, including buffers;	Section 1.3
i) a description of any assumptions made and any uncertainties or gaps in knowledge;	Section 1.1.4
j) a description of the findings and potential implications of such findings on the impact of the proposed activity, including identified alternatives on the environment;	Section 1.5, 1.6, 1.7 and 1.8
k) any mitigation measures for inclusion in the EMPr;	Section 1.7 and Section 1.8
l) any conditions for inclusion in the environmental authorisation;	Not applicable
m) any monitoring requirements for inclusion in the EMPr or environmental authorisation;	Section 1.8
n) a reasoned opinion- <ul style="list-style-type: none"> i. as to whether the proposed activity or portions thereof should be authorised; and ii. if the opinion is that the proposed activity or portions thereof should be authorised, any avoidance, management and mitigation measures that should be included in the EMPr, and where applicable, the closure plan; 	Section 1.9
o) a description of any consultation process that was undertaken during the course of preparing the specialist report;	Not Applicable
p) a summary and copies of any comments received during any consultation process and where applicable all responses thereto; and	Section 1.5.1
q) any other information requested by the competent authority.	Not applicable

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LIST OF ABBREVIATIONS

DEA	Department of Environmental Affairs
EIA	Environmental Impact Assessment
PIA	Palaeontological Impact Assessment
SAHRA	South African Heritage Resources Agency
Ma / mya	Million years ago

GLOSSARY

Definitions	
<i>Basement Rocks</i>	Ancient igneous and metamorphic rocks (usually unfossiliferous) underlying the sedimentary cover rocks in a given region
<i>Calcrete</i>	Pedogenic limestone (<i>i.e.</i> limestone generated by soil processes within soils and surface rock debris), generally associated with seasonally arid climates.
<i>Fossiliferous</i>	Containing fossil remains
<i>Igneous Rocks</i>	Rocks that have crystallised from a molten state (magma / lava); <i>e.g.</i> granite.
<i>Metamorphic</i>	Rocks that have recrystallized under conditions of altered (usually highly elevated) temperature and pressure; <i>e.g.</i> gneiss.
<i>Precambrian</i>	Older than 541 million years old (mya).
<i>Pleistocene Epoch</i>	Time period between c. 2.6 mya and 10 000 years ago (associated with a series of major glaciations in the northern hemisphere).

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PALAEONTOLOGICAL IMPACT ASSESSMENT

This report presents the findings of the Palaeontological Impact Assessment that was prepared by Dr. John Almond (of Natura Viva cc) as part of the Basic Assessment (BA) for the proposed Kenhardt PV 1 – Transmission Line, Kenhardt PV 2 – Transmission Line and Kenhardt PV 3 – Transmission Line projects within the Northern Cape Province.

1.1 INTRODUCTION AND METHODOLOGY

1.1.1 *Scope and Objectives*

The proposed 132 kV and 33 kV/22 kV transmission line connections for the proposed Kenhardt PV 1, Kenhardt PV 2 and Kenhardt PV 3 75 MW Solar Photovoltaic (PV) Facility projects overlie potentially fossiliferous sedimentary rocks. A desktop Palaeontological Impact Assessment - or at least a letter of exemption from a palaeontologist to indicate that this is unnecessary – has been requested by the South African Heritage Resources Agency (SAHRA) Archaeology, Palaeontology and Meteorites Unit for the three proposed PV developments and the associated electrical infrastructure (Case IDs: 8204, 8205 and 8206 letters of September 22, 2015; Case Numbers for the transmission line projects are 8207, 8208 and 8209).

Linked to the above, this present report provides desktop assessments of potential impacts on local palaeontological (*i.e.* fossil) heritage within the transmission line corridor between the proposed Kenhardt PV 1, Kenhardt PV 2 and Kenhardt PV 3 75 MW Solar PV Facilities on the remaining extent of Onder Rugzeer Farm 168 and the Eskom Nieuwehoop Substation that is currently being constructed on Farm Gemsbok Bult (remaining extent of Portion 3 of Farm 120), situated c. 20 km north-east of Kenhardt, Northern Cape Province. This report contributes to the BA's for the proposed transmission lines and includes recommendations for inclusion in the corresponding Environmental Management Programme (EMPr).

The overall objectives of the specialist study are to:

- Determine the current conditions in sufficient detail so that there is a baseline against which impacts can be identified and measured.
- Identify potential impacts that may occur during the construction, operational and decommissioning phases of the proposed development, as well as impacts associated with future environmental changes if the “no-go” option is implemented (both positive and negative).
- Assess the impacts in terms of direct, indirect and cumulative impacts.
- Provide recommendations with regards to potential monitoring programmes.
- Determine mitigation and/or management measures which could be implemented to as far as possible reduce the effect of negative impacts and enhance the effect of positive impacts.
- Incorporate and address all issues and concerns raised in relation to palaeontological impacts.

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1.1.2 Terms of Reference

The Terms of Reference for the present study, as defined by the CSIR, are as follows:

1. Review detailed information relating to the project description and precisely define the environmental risks to palaeontological heritage, and consequences thereto.
2. Conduct a review of available information pertaining to the study area.
3. Draw on desktop information sources, the knowledge of local experts, information published in the scientific press and information derived from relevant EIAs and similar specialist studies previously conducted within the surrounding area.
4. Prepare and undertake a desktop study on the palaeontology and fossil heritage within the proposed project area, based on:
 - a review of all relevant palaeontological and geological literature, including geological maps and previous reports,
 - location and examination of fossil collections from the study area (e.g. museums), and
 - data on the proposed development (e.g. location of footprint, depth and volume of bedrock excavation envisaged).
5. Describe the type and location of known fossil heritage sites in the study area, and characterize all items that may be affected by the proposed project.
6. Describe the baseline environment and determine the *status quo* in relation to palaeontological impacts.
7. Note fossils and associated sedimentological features of palaeontological relevance (photos, maps, aerial or satellite images, and stratigraphic columns).
8. Analyse the stratigraphy, age and depositional setting of fossil-bearing units.
9. Evaluate the potential for occurrence of palaeontological heritage features within the study area.
10. Incorporate relevant information from other specialist reports/findings, if required.
11. Identify and rank the highlights and sensitivities to development of fossil heritage within study area.
12. Identify and rate potential direct, indirect and cumulative impacts of the proposed project on the palaeontology and fossil heritage during the construction, operational and decommissioning phases of the project. Study the cumulative impacts of the project by considering the impacts of existing industries / solar PV plants within the area (as well as those PV plants that are proposed), together with the impact of the proposed project.
13. Provide recommendations and suggestions regarding fossil heritage management on site, including conservation measures, as well as promotion of local fossil heritage (e.g. for public education, schools) to ensure that the impacts are limited.
14. Provide input to the EMP, including mitigation and monitoring requirements to ensure that the impacts on the archaeological features and heritage features are limited.
15. Provide specific recommendations for further palaeontological mitigation (if any).
16. Compile an illustrated, fully-referenced review of palaeontological heritage within study area based on desktop study.

1.1.3 Approach and Methodology

The approach to a Phase 1 palaeontological heritage study is briefly as follows. 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 and palaeontological database (consultation with professional colleagues as well as

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examination of institutional fossil collections may play a role here. 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 Western, Eastern and Northern Cape have already been compiled by J. Almond and colleagues (e.g. Almond & Pether 2008). 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 significantly the extent of fresh bedrock excavation envisaged. When rock units of moderate to high palaeontological sensitivity are present within the development footprint, a Phase 1 field assessment study by a professional palaeontologist is usually warranted to identify any palaeontological hotspots and make specific recommendations for any mitigation required before or during the construction phase of the development. **However, due to the low palaeontological sensitivity of the present study area a Phase 1 field assessment is not required and a desktop assessment is being undertaken instead (i.e. this study).**

On the basis of the desktop and Phase 1 field assessment 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. Phase 2 mitigation by a professional palaeontologist – normally involving the recording and sampling of fossil material and associated geological information (e.g. sedimentological data) may be required (a) in the pre-construction phase where important fossils are already exposed at or near the land surface and / or (b) 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 authorities for the Northern Cape, i.e. SAHRA (Contact details: Mrs Colette Scheermeyer, P.O. Box 4637, Cape Town 8000, Tel: 021 462 4502, Email: cscheermeyer@sahra.org.za). It should be emphasized 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.

1.1.4 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 South Africa, 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.

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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 computerized database of fossil collections in major South African institutions which can be consulted for impact studies. A Karoo fossil vertebrate database is now accessible for impact study work.

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 South Africa 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.

In the case of the Scatec Solar project area near Kenhardt in the Northern Cape, bedrock exposure is limited due to extensive cover by superficial deposits (e.g. alluvium, soils, surface gravels), especially in areas of low relief, as well as by pervasive *bossieveld* vegetation. For this reason, as well as the low palaeontological sensitivity of the sedimentary rocks mapped in the project area, a desktop-level rather than field-based assessment was considered appropriate for this study. Given the uniformity of the bedrock geology and superficial deposits (and hence palaeontological sensitivity) underlying the various transmission line routes under consideration, a single Palaeontological Impact Assessment Report is considered to be suitable and sufficient for the proposed 132 kV transmission lines (*i.e.* a separate study is not needed for each line/corridor).

Despite the lack of palaeontological field data from the project area itself, confidence levels in the conclusions reached in the desktop study are moderately high because of the author’s field experience of the sedimentary rocks represented in the wider Bushmanland region (See reference list for previous palaeontological assessments in the area; e.g. Almond 2009, 2011, 2014a, 2014b, 2014c, 2014d). Recent palaeontological heritage assessments for several other alternative energy developments in the region have been taken into consideration (e.g. the Nieuwehoop Solar Park just to the east of the proposed project area).

In terms of the impact assessment, the methodology adopted is outlined in the BA Report, which also notes the developments within a 20 km radius that have been considered in order to assess cumulative impacts.

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1.1.5 Sources of Information

The information used in this desktop study was based on the following sources:

1. A detailed project outline supplied by the CSIR - Environmental Management Services.
2. Previous desktop palaeontological assessment reports for study areas in the Kenhardt region by the author (Almond 2009, 2011, 2014a, 2014b, 2014c, 2014d). The last two reports assess fossil heritage resources within the Nieuwehoop Solar Park on farms Gembok Bult 120 and Boven Rugzeer 169.
3. A review of the relevant scientific literature, including published geological maps (e.g. 1: 250 000 scale geological map sheet 2920 Kenhardt published by the Council for Geoscience, Pretoria) and accompanying sheet explanations (e.g. Slabbert *et al.* 1999).
4. The author's previous field experience with the formations concerned and their palaeontological heritage (cf Almond and Pether 2008; SAHRIS website).

1.1.6 Declaration of Independence of Specialists

Refer to the preliminary section of this specialist report for the Curriculum Vitae of Dr. John Almond, which highlights his experience and expertise. The declaration of independence by the specialist is provided in Box 1.1 below and included in Appendix I of this BA Report.

BOX 1.1: DECLARATION OF INDEPENDENCE

I, John Almond, declare that I am an independent consultant and have no business, financial, personal or other interest in the proposed Kenhardt PV 1 – Transmission Line, Kenhardt PV 2 – Transmission Line and Kenhardt PV 3 – Transmission Line Projects, 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.



JOHN ALMOND

1.2 DESCRIPTION OF PROJECT ASPECTS RELEVANT TO PALAEONTOLOGICAL HERITAGE IMPACTS

A detailed description of the proposed project is included in Section A of the BA Report. The proposed transmission line and electrical infrastructure BA project will include the following connectivity options:

- The construction of a single 132 kV transmission line from each Kenhardt PV facility to the Eskom Nieuwehoop Substation; or
- Connect the Kenhardt PV 2 and Kenhardt PV 3 projects via separate 22 kV/33 kV transmission lines to the proposed Kenhardt PV 1 on-site substation which will link via a 132 kV line to the Eskom Nieuwehoop Substation; or
- Construct one 132 kV transmission line from the Kenhardt PV 1 project to the Eskom Nieuwehoop Substation and connect the Kenhardt PV 2 and Kenhardt PV 3 facilities

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together via medium voltage transmission lines to either the on-site substation of Kenhardt PV 2 or PV 3, followed by the construction of one 132 kV transmission line from the on-site substation to the Eskom Nieuwehoop Substation.

The above proposed transmission lines will be constructed within an electrical infrastructure corridor (as shown in Figure 1), which has been assessed in this report.

As noted above, the Scatec Solar project area near Kenhardt is located in a region of Bushmanland that is underlain by potentially fossiliferous sedimentary rocks of Late Tertiary or Quaternary age as well as by unfossiliferous basement rocks (as discussed in Section 1.3 of this report). The construction phase of the proposed transmission lines for each PV project will entail excavations into the superficial sediment cover and locally into the underlying bedrock as well. These include, for example, surface clearance operations and small excavations for the electrical pylon footings. All these developments may adversely affect potential, legally-protected fossil heritage resources within the study area by destroying, disturbing or permanently sealing-in fossils at or beneath the surface of the ground that are then no longer available for scientific research or other public good.

The planning, operational and decommissioning phases of the proposed transmission lines are very unlikely to involve additional adverse impacts on local palaeontological heritage, however.

1.3 DESCRIPTION OF THE AFFECTED ENVIRONMENT

In this section of the report an outline of the geology of the corridor of the proposed transmissions line is first given, based on the relevant geological maps and scientific literature. This is followed by a brief review of fossil heritage that has previously been recorded from the sedimentary rock units that are represented within the project area.

1.3.1 Geological context

As mentioned above, the study area for the proposed 132 kV and 33 kV/22 kV transmission lines, located on the farms Onder Rugzeer 168, Boven Rugzeer 169 (only traversing above) and Gemsbok Bult 120, is located some 20 km northeast of Kenhardt, Northern Cape. The area is situated within the semi-arid Bushmanland region at elevations of between c. 930 to 970 m amsl, with a general slope towards the southwest. It is drained by a dendritic network of shallow, southwest-flowing tributary streams of the Hartbeesrivier. The geology of the study area is shown on the 1: 250 000 geology sheet 2920 Kenhardt (Council for Geoscience, Pretoria) (Figure 1). The entire area is underlain at depth by a variety of Precambrian basement rocks that are c. 2 billion years old and are assigned to the **Namaqua-Natal Province**. These ancient igneous and high-grade metamorphic rocks - mainly granites and gneisses - crop out at surface as small patches and are entirely unfossiliferous. The Precambrian crustal rocks are transected by a NW-SE trending fault zone and lie to the north of the major Wolfkop Fault. The basement rock units represented in the transmission line study areas include the **Jacomyns Pan Group** (gneisses of the Sandnoute Formation) and the **Keimoes Suite** (Elsie se Gorra Granite). These rock units are described in the Kenhardt 1: 250 000 sheet explanation by Slabbert *et al.* (1999) and placed in the context of the Namaqua-Natal Province by Cornell *et al.* (2006). However, they are entirely unfossiliferous and so will not be discussed further here.

A large proportion of the basement rocks in the transmission line project area are mantled by a range of superficial sediments of Late Caenozoic age, some of which are included within the **Kalahari Group**. These predominantly thin, unconsolidated deposits include small patches of calcretes (soil limestones), gravelly to sandy river alluvium, pan sediments along certain

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watercourses, surface gravels, colluvium (scree) as well as – especially – Quaternary to Recent aeolian (wind-blown) sands of the Gordonia Formation (Kalahari Group). According to the geological map, the basement rocks in the transmission line corridor are largely mantled by aeolian sands of the **Gordonia Formation** (“Kalahari sands”) as well as Late Caenozoic alluvial deposits associated with small drainage courses.

The geology of the Late Cretaceous to Recent Kalahari Group is reviewed by Thomas (1981), Dingle *et al.* (1983), Thomas & Shaw (1991), Haddon (2000) and Partridge *et al.* (2006). The thickness of the unconsolidated Kalahari sands in the Bushmanland area is variable and often uncertain. The Gordonia Formation dune sands are considered to range in age from the Late Pliocene/Early Pleistocene to Recent, dated in part from enclosed Middle to Late Stone Age stone tools (Dingle *et al.*, 1983, p. 291). Note that the recent extension of the Pliocene - Pleistocene boundary from 1.8 Ma back to 2.588 Ma would place the older Gordonia Formation sands entirely within the Pleistocene Epoch. A number of older Kalahari formations underlie the young wind-blown surface sands in the main Kalahari depository to the north of the study area. However, at the latitude of the study area near Kenhardt (c. 29° S) Gordonia Formation sands less than 30 m thick are likely to be the main or perhaps only Kalahari sediments present (*cf* isopach map of the Kalahari Group, Figure 6 in Partridge *et al.*, 2006). These unconsolidated sands will be locally underlain by thin subsurface gravels along the buried palaeosurface and perhaps by calcretes of Pleistocene or younger age (*cf* Mokalanen Formation).

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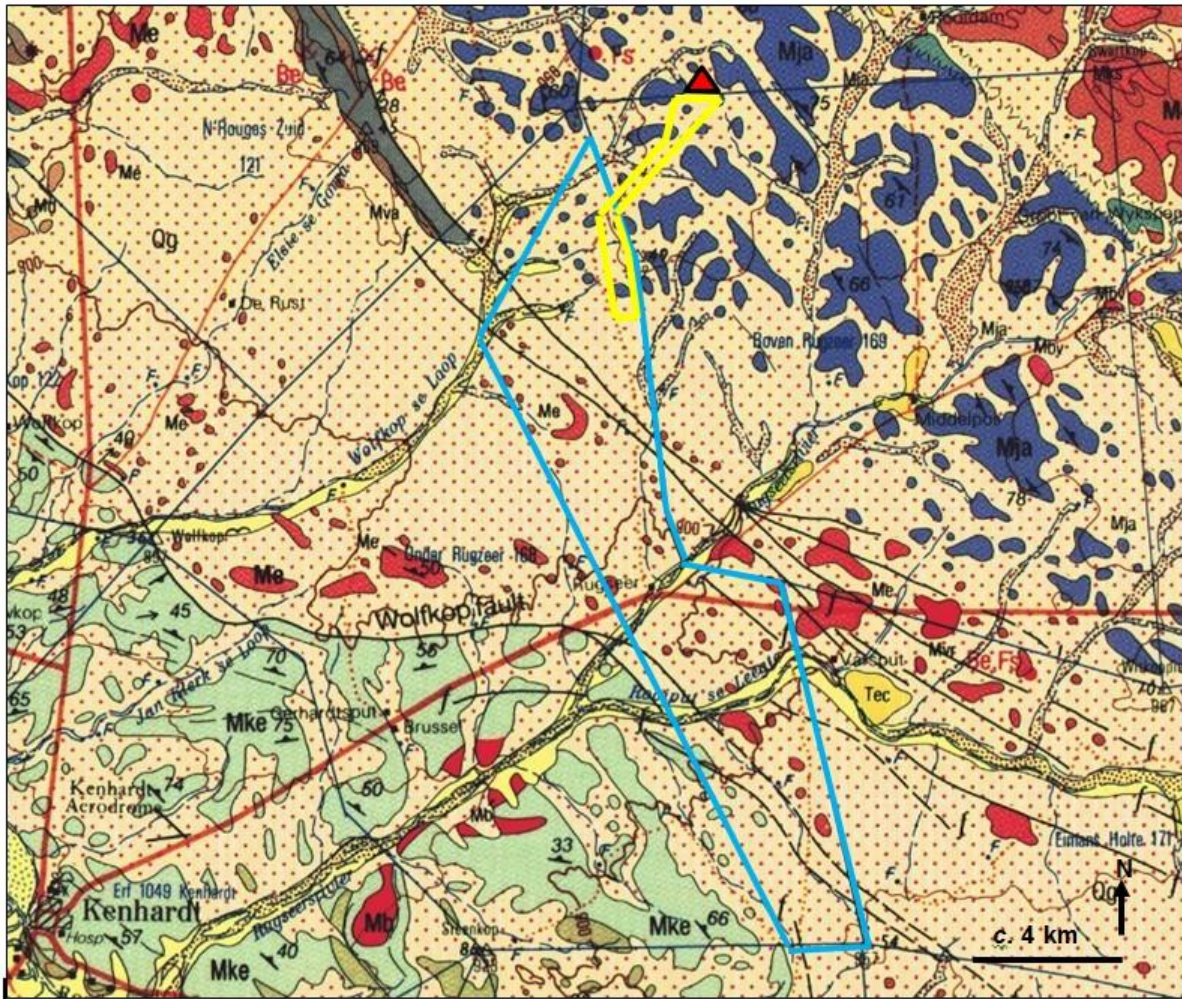


Figure 1. Extract from 1: 250 000 scale geological map sheet 2920 Kenhardt (Council for Geoscience, Pretoria) showing the geology of the Scatec Solar PV Facilities study area on Farm Onder Rugzeer 168 (blue polygon) situated c. 20 km to the NE of Kenhardt, Northern Cape. Eskom Nieuwehoop Substation on Gemsbok Bult 120 (shown by the red triangle) and the proposed electrical infrastructure corridor is shown in yellow.

Linked to Figure 1 above, the main geological units represented within the broader Scatec Solar project area, including the transmission line corridor, include:

PRECAMBRIAN BASEMENT ROCKS:

KEIMOES SUITE:

- Red (Me) = Elsie se Gorra Granite

KORANNALAND SUPERGROUP:

- Brown (Mva) = Valsvlei Formation, Biesje Poort Group
- Grey (Msa) = Sandputs Formation, Biesje Poort Group
- Blue (Mja) = Sandnoute Formation, Jacomyns Pan Group

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VYFBEKER METAMORPHIC SUITE:

- **Pale blue-green (Mke) = Kenhardt Migmatite**

LATE CAENOZOIC SUPERFICIAL SEDIMENTS:

- **Pale yellow with sparse red stipple (Qg) = aeolian sands of the Gordonia Formation (Kalahari Group)**
- **Pale yellow with dense red stipple = alluvial and pan sediments**
- **Dark yellow (Tec) = calcrete**

1.3.2 *Palaeontological Heritage*

The Precambrian basement rocks represented within the study area are igneous granitoids or high grade metamorphic rocks that were last metamorphosed some 1 billion years ago and are entirely unfossiliferous. The sparse fossil record of Late Caenozoic superficial sediments in the Bushmanland region are briefly reviewed here (Refer also to Table 1). Note that, to the author's knowledge, there are no fossil records from the broader Scatec Solar project area itself, including the transmission line corridor, and no palaeontological fieldwork has been undertaken here (See also relevant desktop palaeontological assessments for farms Boven Rugzeer 169 and Gemsbok Bult 120 by Almond 2014c, 2014d).

The diverse superficial deposits within the South African interior, including Bushmanland, have been comparatively neglected in palaeontological terms. However, sediments associated with ancient drainage systems, springs and pans may occasionally contain important fossil biotas, notably the bones, teeth and horn cores of mammals as well as remains of reptiles like tortoises (e.g. Skead 1980, Klein 1984b, Brink 1987, Bousman *et al.* 1988, Bender & Brink 1992, Brink *et al.* 1995, MacRae 1999, Meadows & Watkeys 1999, Churchill *et al.* 2000, Partridge & Scott 2000, Brink & Rossouw 2000, Rossouw 2006, Almond *in* Macey *et al.* 2011). Other late Caenozoic fossil biotas that may occur within these superficial deposits include non-marine molluscs (bivalves, gastropods), ostrich egg shells, trace fossils (e.g. calcretised termitaria, coprolites, invertebrate burrows, rhizocretions), and plant material such as peats or palynomorphs (pollens) in organic-rich alluvial horizons (Scott 2000) and diatoms in pan sediments. In Quaternary deposits, fossil remains may be associated with human artefacts such as stone tools and are also of archaeological interest (e.g. Smith 1999 and references therein). Ancient solution hollows within extensive calcrete hardpans may have acted as animal traps in the past. As with coastal and interior limestones, they might occasionally contain mammalian bones and teeth (perhaps associated with *hyaena dens*) or invertebrate remains such as snail shells.

Diverse fossils associated with the ancient Tertiary drainage systems of the Karoo and Bushmanland region have been summarized by Almond *in* Macey *et al.* (2011). See also articles by Cooke 1949, Wells 1964, Butzer *et al.* 1973, Helgren 1977, Klein 1984, Macrae 1999). They include remains of fish, reptiles, mammals, freshwater molluscs, petrified wood and trace fossils (e.g. De Wit 1990, 1993, De Wit & Bamford 1993, Bamford 2000, Bamford & De Wit 1993, Senut *et al.* 1996).

In the Brandvlei area to the southwest of Kenhardt lies the north-south trending Geelvloer Palaeo-valley, a Mid Tertiary palaeodrainage system that links up with the Commissioners Pan

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– Koa Valley system to the northwest. Here calcretised basal alluvial facies contain bones of hippopotamus-like artiodactyls called anthracotherids indicating a Miocene age (De Wit 1993, 1999, De Wit *et al.* 2000). Anthracotherids are an extinct group of amphibious mammalian herbivores only distantly related to true hippos that were widespread in the Miocene of Africa (Schneider & Marais 2004). Early to Mid-Miocene silicified woods from Brandvlei are referable to a number of extant tree families, including the Dipterocarpaceae that mainly inhabit tropical forests in Africa and Asia today. The fossil woods and associated sediments indicate that warm, tropical to subtropical climates prevailed in the Mid-Miocene and that perennial, low-sinuosity braided river systems supported lush riparian forests (De Wit & Bamford 1993, Bamford & De Wit 1993, Bamford 2000). Wet, weakly seasonal climates are suggested by the structure (indistinct growth rings) and dimensions (trunk diameters of over 50 cm) of the fossil woods (Bamford 2000).

Abraded Plio-Pleistocene fossil woods from relict alluvial terraces of the Sak River just north of Brandvlei include members of the Family Polygalaceae and also indicate humid growth conditions (Bamford & De Wit 1993). These terraces were formed by meandering rivers during intermittent pluvial (i.e. wetter), but still semi-arid, episodes following the onset of generally arid conditions in the western portion of southern Africa towards the end of the Miocene. So far fossils have not been recorded from the Sakrivier system closer to Kenhardt.

Pan sediments in Bushmanland have also recently yielded interesting Pleistocene mammalian faunas in association with age-diagnostic archaeological material. Important fossil mammalian remains assigned to the Florisian Mammal Age (c. 300 000 – 12 000 BP; MacRae 1999) have recently been documented from stratigraphic units designated Group 4 to Group 6 (i.e. calcrete hardpan and below) at Bundu Pan, some 22 km northwest of Copperton (Kiberd 2006 and references therein). These are among very few Middle Pleistocene faunal records from stratified deposits in the southern Africa region (Klein 1980, 1984a, 1984b, 2000) and are therefore of high palaeontological significance. Characteristic extinct Pleistocene species recorded at Bundu Pan are the giant Cape Horse or Zebra (*Equus capensis*) and the Giant Hartebeest (*Megalotragus priscus*). Other extant to extinct taxa include species of warthog, blesbok, black wildebeest, springbok and baboon. There is additionally trace fossil evidence for hyaenids (tooth marks) as well as ostrich egg shell. Preliminary dating and the inferred ecology of the fossil taxa present suggests the presence of standing water within a grassy savanna setting during the 200 - 300 000 BP interval when the Bunda Pan faunal assemblage accumulated. A sequence of Earlier, Middle and Later Stone Age (ESA, MSA and LSA, respectively) artefact assemblages is also recorded from this site. Stratigraphic Groups 4 to 6 (i.e. calcrete hardpan and below) contain a Final Acheulian or transitional ESA/MSA artefact assemblage, while Groups 2 - 3 above the calcrete horizon contain a MSA artefact assemblage. Orton (2012) recorded a single fossil equid tooth associated with a rich MSA artefact assemblage from gravels overlying a calcrete hardpan on the farm Hoekplaas near Copperton. This horizon is probably equivalent to Group 3 of Kiberd's stratigraphy at Bundu Pan, and therefore somewhat younger than the Florisian mammal fauna reported there.

The fossil record of the Kalahari Group as a whole is generally sparse and low in diversity; no fossils are recorded here in the Kenhardt geology sheet explanation by Slabbert *et al.* (1999). The Gordonia Formation dune sands were mainly active during cold, drier intervals of the Pleistocene Epoch that were inimical to most forms of life, apart from hardy, desert-adapted species. Porous dune sands are not generally conducive to fossil preservation. However, mummification of soft tissues may play a role here and migrating lime-rich groundwaters derived from underlying lime-rich bedrocks may lead to the rapid calcretisation of organic structures such as burrows and root casts. Occasional terrestrial fossil remains that might be expected within this unit include calcretized rhizoliths (root casts) and termitaria (e.g.

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Hodotermes, the harvester termite), ostrich egg shells (*Struthio*), tortoise remains and shells of land snails (e.g. *Trigonephrus*) (Almond in Macey *et al.* 2011, Almond & Pether 2008). Other fossil groups such as freshwater bivalves and gastropods (e.g. *Corbula*, *Unio*), ostracods (seed shrimps), charophytes (stonewort algae), diatoms (microscopic algae within siliceous shells) and stromatolites (laminated microbial limestones) are associated with local watercourses and pans. Microfossils such as diatoms may be blown by wind into nearby dune sands (Du Toit 1954, Dingle *et al.*, 1983). These Kalahari fossils (or subfossils) can be expected to occur sporadically but widely, and the overall palaeontological sensitivity of the Gordonia Formation is therefore considered to be low. Underlying calcretes might also contain trace fossils such as rhizoliths, termite and other insect burrows, or even mammalian trackways. Mammalian bones, teeth and horn cores (also tortoise remains, and fish, amphibian or even crocodiles in wetter depositional settings) may be expected occasionally expected within Kalahari Group sediments and calcretes, notably those associated with ancient alluvial gravels (See Koa River Valley above). The younger (Pleistocene to Recent) fluvial and alluvial sands and gravels within the proposed development area are unlikely to contain many, if any, substantial fossil or subfossil remains.

Table 1: Fossil heritage recorded from the major rock units that are represented within the broader Scatec Solar study area near Kenhardt (including transmission line corridor to Nieuwehoop Substation)

GEOLOGICAL UNIT	ROCK TYPES AND AGE	FOSSIL HERITAGE	PALAEONT-OLOGICAL SENSITIVITY
LATE CAENOZOIC SUPERFICIAL SEDIMENTS, especially ALLUVIAL AND PAN SEDIMENTS	fluvial, pan, lake and terrestrial sediments, including diatomite (diatom deposits), pedocretes (e.g. calcrete), colluvium (slope deposits such as scree), aeolian sands (Gordonia Formation, Kalahari Group) LATE TERTIARY, PLEISTOCENE TO RECENT	bones and teeth of wide range of mammals (e.g. mastodont proboscideans, rhinos, bovids, horses, micromammals), fish, reptiles (crocodiles, tortoises), ostrich egg shells, fish, freshwater and terrestrial molluscs (unionid bivalves, gastropods), crabs, trace fossils (e.g. calcretised termitaria, horizontal invertebrate burrows, stone artefacts), petrified wood, leaves, rhizoliths, stromatolites, diatom floras, peats and palynomorphs.	GENERALLY LOW BUT LOCALLY HIGH (e.g. Tertiary alluvium associated with old river courses)
Basement granites and gneisses NAMAQUA-NATAL PROVINCE	Highly-metamorphosed sediments, intrusive granites MID-PROTEROZOIC (c.1- 2 billion years old)	none	ZERO

1.4 APPLICABLE LEGISLATION AND PERMIT REQUIREMENTS

All South African fossil heritage, including palaeontological sites and specimens, is protected by law (National Heritage Resources Act (Act 25 of 1999)) and fossils cannot be collected, damaged, destroyed or disturbed without a permit from SAHRA or the relevant Provincial Heritage Resources Agency.

As mentioned previously, where palaeontological mitigation of a development project is required, the palaeontologist concerned with mitigation work would need a valid fossil collection permit from SAHRA and any material collected would have to be curated in an approved depository (e.g. museum or university collection). All palaeontological specialist work should conform to international best practice for palaeontological fieldwork and the study (e.g. data

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recording fossil collection and curation, final report) should adhere as far as possible to the minimum standards for Phase 2 palaeontological studies recently developed by SAHRA (2013).

The present palaeontological heritage assessment falls under Sections 35 and 38 (Heritage Resources Management) of the National Heritage Resources Act (Act 25 of 1999), and it will also inform the EMP for these projects.

The various categories of heritage resources recognised as part of the National Estate in Section 3 of the National Heritage Resources Act (Act 25 of 1999) include, among others:

- geological sites of scientific or cultural importance;
- palaeontological sites; and
- 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—
 - i. destroy, damage, excavate, alter, deface or otherwise disturb any archaeological or palaeontological site or any meteorite;
 - ii. destroy, damage, excavate, remove from its original position, collect or own any archaeological or palaeontological material or object or any meteorite;
 - iii. 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
 - iv. 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

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proposing to undertake the development if no application for a permit is received within two weeks of the order being served.

1.5 IDENTIFICATION OF KEY ISSUES

1.5.1 Key Issues Identified During the Scoping Phase

The only key issue identified by the specialist during the Project Initiation Phase is the potential loss of palaeontological heritage resources (fossils, fossil sites including their geological context) through surface clearance and excavations into sedimentary rocks during the construction phase of the transmission line projects.

The Scoping Report was released for a 30-day comment period which extended from 25 September 2015 to 27 October 2015. The Addendum to the Scoping Report was also released for a 30-day comment period, extending from 6 October 2015 to 5 November 2015. To date, only one comment was raised by the SAHRA regarding impacts on palaeontological heritage posed by the proposed Scatec Solar development. No further comments have been received in relation to palaeontological impacts.

The following comment was received from the SAHRA on 22 September 2015 (via SAHRIS) based on the review of the Background Information Document (in relation to the Kenhardt PV 1, PV 2 and PV 3 projects, Case References 8204, 8205 and 8206. It is important to note that only the points relating to palaeontological aspects have been extracted from the SAHRA comments and noted below:

- *The PalaeoSensitivity Map on SAHRIS (<http://www.sahra.org.za/sahris/map/palaeo>) indicates moderate palaeontological sensitivity for the proposed area. Therefore, the SAHRA Archaeology, Palaeontology and Meteorites Unit requires a desktop Palaeontological Impact Assessment to be undertaken to assess whether or not the development will impact upon palaeontological resources - or at least a letter of exemption from a Palaeontologist is needed to indicate that this is unnecessary. If the area is deemed sensitive, a full Phase 1 Palaeontological Impact Assessment will be required and if necessary a Phase 2 rescue operation might be necessary.*

As noted above, based on the low palaeontological sensitivity of the area, this desktop Palaeontological Impact Assessment is being undertaken during the BA Phase (i.e. prior to the commencement of construction of the Kenhardt PV and Transmission Line projects (subject to the issuing of an Environmental Authorisation)). As mentioned above, this specialist assessment is conducted by Dr. John Almond in order to assess the significance of potential impacts of the proposed project on palaeontological resources (which is discussed in Section 1.6 of this report).

1.5.2 Identification of Potential Impacts

The potential impacts identified during the BA Phase are:

1.5.3 Construction Phase

- Potential loss of palaeontological heritage resources through disturbance, damage or destruction of fossils and fossil sites (including associated geological contextual data) through surface clearance and excavation activities during the construction phase.

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1.5.4 Operational Phase

No significant impacts on palaeontological heritage are anticipated during the operational phase of the proposed transmission line developments.

1.5.5 Decommissioning Phase

No significant impacts on palaeontological heritage are anticipated during the decommissioning phase of the developments.

1.5.6 Cumulative Impacts

- Potential cumulative loss of palaeontological heritage resources through disturbance, damage or destruction of fossils and fossil sites (including associated geological contextual data) through surface clearance and excavation activities during the construction phase of proposed 132 kV and 33 kV/22 kV transmission lines in the context of several alternative energy projects planned within the broader Kenhardt region and other key electrical infrastructure developments within a 20 km radius of the proposed project site.

1.6 ASSESSMENT OF IMPACTS AND IDENTIFICATION OF MANAGEMENT ACTIONS

In this section of the report potential impacts of the construction, operational and decommissioning phases of the proposed 132 kV and 33 kV/22 kV transmission lines on palaeontological heritage are outlined and recommendations for any necessary monitoring or mitigation are provided. Possible cumulative impacts in the light of other alternative energy development proposals in the Kenhardt region are also evaluated.

1.6.1 Potential Impacts (Construction Phase)

The construction phase of the proposed 132 kV and 33 kV/22 kV transmission lines will entail surface clearance for excavations into the superficial sediment cover (aeolian sands, surface gravels, stream alluvium etc.), which may contain fossil remains, and in some cases also into the underlying unfossiliferous bedrock. These include numerous shallow excavations for electrical pylon footings. As a result, fossils at the ground surface or buried beneath it may be disturbed, damaged, destroyed or sealed-in while their scientifically informative sedimentary context will also be disturbed or destroyed. Once constructed, the operational and decommissioning phases of the proposed transmission lines will not involve further adverse impacts on palaeontological heritage, however.

Desktop analysis of the fossil records of the various rock units underlying the broader proposed project area indicates that the majority of these units are of zero to low palaeontological sensitivity (as discussed in Section 1.3.2 and Table 1 of this report). The basement rocks are entirely unfossiliferous while the overlying Late Caenozoic superficial sediments (wind-blown sands, alluvium, gravels etc.) are of low to very low palaeontological sensitivity. Construction of the proposed transmission lines, especially given their short length (between 4 and 9 km) and the small pylon footings envisaged is therefore unlikely to entail significant impacts on local fossil heritage resources.

The inferred impacts of each of the proposed transmission lines on local fossil heritage are assessed in Tables 2, 4 and 6 below. These assessments apply only to the construction phase of the proposed developments since further impacts on fossil heritage during the operational and decommissioning phases of the transmission lines are not anticipated. **The results of the**

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assessments are identical, due to the essential similarity in the underlying geology (Figure 1).

The destruction, damage or disturbance out of context of fossils and fossil sites preserved at the ground surface or below ground represents a *direct negative* impact that is confined to the development footprint (*site specific*). Such impacts are made only during the construction period, and can usually be partially mitigated but cannot be fully rectified; *i.e.* they are *non-reversible* and of *permanent* duration. Since several of the sedimentary units represented within the study area do contain fossils of some sort, some level impact on fossil heritage is probable (*likely*). However, because of the generally very sparse occurrence of well-preserved, scientifically-valuable fossils within the superficial sediments, and because most of the fossils encountered are likely to be of widespread occurrence (low irreplaceability) the consequence of these impacts is rated as *slight*.

No previously recorded areas or sites of exceptional fossil heritage sensitivity or significance have been identified within the proposed project area as a whole, including the transmission line corridor. Due to the inferred scarcity of exceptional fossil remains within the study area, as well as the shortness of all transmission lines and the small pylon footings envisaged, the overall impact significance of the construction phase of the proposed projects is assessed as *VERY LOW* (without mitigation) in all three cases. Because of the paucity of palaeontological field studies within this part of Bushmanland, confidence levels for this desktop palaeontological heritage assessment are only moderate (medium).

Specialist palaeontological monitoring and mitigation for this project are not recommended, pending the discovery of new fossil sites during development, given the uniformly low impact significance. The Environmental Control Officer responsible for the construction phase of the project should be aware of the necessity of conserving fossils and should monitor all substantial excavations into sedimentary rocks for fossil remains. Proposed mitigation of chance fossil finds during the construction phase involves safeguarding of the fossils (preferably *in situ*) by the responsible Environmental Control Officer, reporting of finds to the SAHRA and, where appropriate, judicious sampling and recording of fossil material and associated geological data by a qualified palaeontologist (as discussed in Section 1.8 of this report). Should these recommended mitigation measures be fully implemented, the impact significance of the transmission line developments would remain *VERY LOW* but small residual negative impacts (*e.g.* loss of undetected fossils) would remain. However, these negative impacts would be partially offset through the improved scientific understanding of local palaeontological heritage in a hitherto poorly-studied region of South Africa which would be considered as a significant *positive* outcome.

There are no fatal flaws in the proposed transmission line development proposals as far as fossil heritage is concerned.

1.6.2 Potential Impacts (Operational and Decommissioning Phases)

No significant impacts on fossil heritage resources are anticipated during the operational and decommissioning phases of the proposed transmission lines.

1.6.3 Cumulative Impacts

The palaeontological heritage impact significance of all the transmission lines proposed by Scatec Solar to service the three proposed PV solar energy developments near Kenhardt (within a 20 km radius of the proposed project) is rated equally as very low. The potentially fossiliferous sedimentary rock units represented within the broader project area are of

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widespread occurrence and this is also likely to apply to most of the fossils they contain. It is concluded that the cumulative impact on fossil heritage resources posed by the proposed transmission lines to the northeast of Kenhardt is of a low significance.

Given the generally low palaeontological sensitivity of the basement and overlying sedimentary rocks in the broader eastern Bushmanland region, significant cumulative impacts on fossil heritage are not anticipated here as a result of the proposed transmission lines in the context of various alternative energy and other infrastructure developments that have been proposed in the region (refer to the several recent palaeontological impact assessments undertaken by the author for projects near Kenhardt that are listed in the references, especially Almond 2014c, 2014d).

1.7 IMPACT ASSESSMENT SUMMARY

The assessment of impacts on palaeontological heritage resources for each proposed transmission line, as well as recommended mitigation and monitoring measures, as discussed above, are collated in Tables 2 to 7 below.

The no-go option (no solar developments and associated transmission lines) will have a neutral impact on local palaeontological heritage resources.

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Table 2: Impact assessment summary table for the Construction Phase (Proposed Transmission Line for Kenhardt PV 1)

Construction Phase													
Direct Impacts													
Aspect/ Impact Pathway	Nature of Potential Impact/ Risk	Status	Spatial Extent	Duration	Consequence	Probability	Reversibility of Impact	Irreplaceability	Potential Mitigation Measures	Significance of Impact and Risk		Ranking of Residual Impact/ Risk	Confidence Level
										Without Mitigation/ Management	With Mitigation/ Management (Residual Impact/ Risk)		
Surface clearance and excavations into superficial sediments	Loss of fossil heritage at or beneath ground surface	Negative	Site	Permanent	Slight	Likely	Non-reversible	Low	<ul style="list-style-type: none"> Undertake monitoring of all substantial excavations into sedimentary rocks for fossil remains and safeguard any finds in situ. Appoint a professional palaeontologist to record and sample any chance fossil finds. 	Very low	Very low	5	Medium

Table 3: Cumulative impact assessment summary table (Proposed Transmission Line for Kenhardt PV 1)

Cumulative Impacts													
Aspect/ Impact Pathway	Nature of Potential Impact/ Risk	Status	Spatial Extent	Duration	Consequence	Probability	Reversibility of Impact	Irreplaceability	Potential Mitigation Measures	Significance of Impact and Risk		Ranking of Residual Impact/ Risk	Confidence Level
										Without Mitigation/ Management	With Mitigation/ Management (Residual Impact/ Risk)		
Surface clearance and excavations into superficial sediments	Loss of fossil heritage at or beneath ground surface	Negative	Site	Permanent	Slight	Likely	Non-reversible	Low	<ul style="list-style-type: none"> Undertake monitoring of all substantial excavations into sedimentary rocks for fossil remains and safeguard any finds in situ. Appoint a professional palaeontologist to record and sample any chance fossil finds. 	Very low	Very low	5	Medium

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Table 4: Impact assessment summary table for the Construction Phase (Proposed Transmission Line for Kenhardt PV 2)

Construction Phase													
Direct Impacts													
Aspect/ Impact Pathway	Nature of Potential Impact/ Risk	Status	Spatial Extent	Duration	Consequence	Probability	Reversibility of Impact	Irreplaceability	Potential Mitigation Measures	Significance of Impact and Risk		Ranking of Residual Impact/ Risk	Confidence Level
										Without Mitigation/ Management	With Mitigation/ Management (Residual Impact/ Risk)		
Surface clearance and excavations into superficial sediments	Loss of fossil heritage at or beneath ground surface	Negative	Site	Permanent	Slight	Likely	Non-reversible	Low	<ul style="list-style-type: none">Undertake monitoring of all substantial excavations into sedimentary rocks for fossil remains and safeguard any finds in situ.Appoint a professional palaeontologist to record and sample any chance fossil finds	Very low	Very low	5	Medium

Table 5: Cumulative impact assessment summary table (Proposed Transmission Line for Kenhardt PV 2)

Cumulative Impacts													
Aspect/ Impact Pathway	Nature of Potential Impact/ Risk	Status	Spatial Extent	Duration	Consequence	Probability	Reversibility of Impact	Irreplaceability	Potential Mitigation Measures	Significance of Impact and Risk		Ranking of Residual Impact/ Risk	Confidence Level
										Without Mitigation/ Management	With Mitigation/ Management (Residual Impact/ Risk)		
Surface clearance and excavations into superficial sediments	Loss of fossil heritage at or beneath ground surface	Negative	Site	Permanent	Slight	Likely	Non-reversible	Low	<ul style="list-style-type: none">Undertake monitoring of all substantial excavations into sedimentary rocks for fossil remains and safeguard any finds in situ.Appoint a professional palaeontologist to record and sample any chance fossil finds	Very low	Very low	5	Medium

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Table 6: Impact assessment summary table for the Construction Phase (Proposed Transmission Line for Kenhardt PV 3)

Construction Phase													
Direct Impacts													
Aspect/ Impact Pathway	Nature of Potential Impact/ Risk	Status	Spatial Extent	Duration	Consequence	Probability	Reversibility of Impact	Irreplaceability	Potential Mitigation Measures	Significance of Impact and Risk		Ranking of Residual Impact/ Risk	Confidence Level
										Without Mitigation/ Management	With Mitigation/ Management (Residual Impact/ Risk)		
Surface clearance and excavations into superficial sediments	Loss of fossil heritage at or beneath ground surface	Negative	Site	Permanent	Slight	Likely	Non-reversible	Low	<ul style="list-style-type: none"> Undertake monitoring of all substantial excavations into sedimentary rocks for fossil remains and safeguard any finds in situ. Appoint a professional palaeontologist to record and sample any chance fossil finds 	Very low	Very low	5	Medium

Table 7: Cumulative impact assessment summary table (Proposed Transmission Line for Kenhardt PV3)

Cumulative Impacts													
Aspect/ Impact Pathway	Nature of Potential Impact/ Risk	Status	Spatial Extent	Duration	Consequence	Probability	Reversibility of Impact	Irreplaceability	Potential Mitigation Measures	Significance of Impact and Risk		Ranking of Residual Impact/ Risk	Confidence Level
										Without Mitigation/ Management	With Mitigation/ Management (Residual Impact/ Risk)		
Surface clearance and excavations into superficial sediments	Loss of fossil heritage at or beneath ground surface	Negative	Site	Permanent	Slight	Likely	Non-reversible	Low	<ul style="list-style-type: none"> Undertake monitoring of all substantial excavations into sedimentary rocks for fossil remains and safeguard any finds in situ. Appoint a professional palaeontologist to record and sample any chance fossil finds 	Very low	Very low	5	Medium

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1.8 INPUT TO THE ENVIRONMENTAL MANAGEMENT PROGRAM

Given the low palaeontological sensitivity of the proposed project area - including the transmission line corridors to the Eskom Nieuwehoop Substation - as determined from desktop analysis, as well as the inferred very low impact significance of the projects for fossil heritage conservation, no specialist palaeontological monitoring or mitigation is recommended here, pending the discovery of substantial new fossil remains during construction.

During the construction phase all substantial bedrock excavations should be monitored for fossil material by the responsible Environmental Control Officer (ECO). Should significant fossil remains - such as vertebrate bones and teeth, plant-rich fossil lenses, petrified wood or dense fossil burrow assemblages - be exposed during construction, the responsible ECO should safeguard these, preferably *in situ*. The SAHRA should be alerted as soon as possible (Contact details: Mrs Colette Scheermeyer, P.O. Box 4637, Cape Town 8000, Tel: 021 462 4502, Email: cscheermeyer@sahra.org.za), so that appropriate action can be taken by a professional palaeontologist, at the developer's expense. Mitigation would normally involve the scientific recording and judicious sampling or collection of fossil material as well as associated geological data (e.g. stratigraphy, sedimentology, taphonomy) by a professional palaeontologist.

The palaeontologist concerned with mitigation work will need a valid fossil collection permit from SAHRA and any material collected would have to be curated in an approved depository (e.g. museum or university collection). All palaeontological specialist work should 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 recently developed by SAHRA (2013).

No monitoring of mitigation is required during the operational and decommissioning phases of the transmission line developments.

These mitigation recommendations should be incorporated into the EMP for each of the proposed transmission lines associated with the Kenhardt Solar PV energy facilities proposed by Scatec Solar.

1.9 CONCLUSION AND RECOMMENDATIONS

The corridor for the proposed transmission lines are underlain at depth by Precambrian basement rocks (c. 1-2 billion years old) assigned to the Namaqua-Natal Province. These ancient igneous and high-grade metamorphic rocks - mainly granites and gneisses of the Keimoes Suite and Jacomynspan Group - crop out at surface in small areas and are entirely unfossiliferous. A large proportion of the basement rocks are mantled by a range of superficial sediments of Late Caenozoic age that may contain sparse fossil remains. These predominantly thin, unconsolidated deposits include small patches of calcretes, gravelly to sandy river alluvium, pan sediments, surface gravels, colluvium (scree) as well as Pleistocene to Recent wind-blown sands of the Gordonia Formation (Kalahari Group). Most of these younger rock units are of widespread occurrence and low palaeontological sensitivity. Scientifically important vertebrate fossil remains (e.g. Pleistocene mammalian bones and teeth) have been recorded within older stratified pan and river sediments elsewhere in the Bushmanland region where they are often associated with stone artefacts, while a limited range of trace fossils (e.g. plant root casts, termitaria and other invertebrate burrows) may be found within calcrete horizons.

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No previously recorded areas or sites of exceptional fossil heritage sensitivity or significance have been identified within the Scatec Solar project area as a whole, including the new transmission line corridor. Due to the inferred scarcity of scientifically important fossil remains within the study areas, as well as the small scale of excavations for electrical pylon footings concerned, the overall impact significance of the construction phase of the transmission lines is assessed as VERY LOW (before and after mitigation). This applies equally to all proposed transmission lines under consideration. No significant impacts on fossil heritage are anticipated during the operational and decommissioning phases of the proposed transmission lines. The potentially fossiliferous sedimentary rock units represented within the study area (e.g. Gordonia aeolian sands, calcrete) are of widespread occurrence and this is also likely to apply to most of the fossils they contain. It is concluded that the cumulative impacts on fossil heritage resources posed by the proposed transmission lines, in the context of several alternative energy and other infrastructural developments planned in the region (as explained in the BA Report), is of very low significance. There are no fatal flaws in the proposed developments, nor are there objections to its authorisation as far as fossil heritage conservation is concerned, since significant impacts on scientifically valuable fossils or fossil sites are not anticipated here. The no-go option (no transmission lines) will have a neutral impact on local palaeontological heritage resources. The only proposed condition to accompany environmental authorisation is that the recommendations for monitoring and mitigation included in the EMPr are fully complied with.

Given the low palaeontological sensitivity of the eastern Bushmanland region, as determined from desktop and field-based studies, as well as the inferred very low impact significance of the proposed transmission lines for fossil heritage conservation, no specialist palaeontological monitoring or mitigation is recommended here, pending the discovery of substantial new fossil remains during construction. Mitigation measures and monitoring recommendations for inclusion in the EMPr are discussed in Sections 1.6 and 1.8 of this report.

For the purposes of this report the entire proposed transmission line corridor was assessed from a palaeontological impact point of view. The applicant is free to select any area within the surveyed area (i.e. the corridor) to construct the transmission lines, provided that the recommended mitigation measures are implemented as applicable.

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