



PALAEONTOLOGICAL
DESKTOP ASSESSMENT

VANNADIUM SOLAR POWER PLANT NEAR NORTHAM, LIMPOPO PROVINCE

2023

COMPILED FOR:

ENVIRONAMICS ENVIRONMENTAL



Declaration of Independence

I, Elize Butler, declare that -

General declaration:

- I act as the independent palaeontological specialist in this application
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favorable to the applicant
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting palaeontological impact assessments, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, Regulations and all other applicable legislation;
- I will take into account, to the extent possible, the matters listed in section 38 of the NHRA when preparing the application and any report relating to the application;
- I have no, and will not engage in, conflicting interests in the undertaking of the activity;
- I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing any decision to be taken with respect to the application by the competent authority; and the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;
- I will ensure that information containing all relevant facts in respect of the application is distributed or made available to interested and affected parties and the public and that participation by interested and affected parties is facilitated in such a manner that all interested and affected parties will be provided with a reasonable opportunity to participate and to provide comments on documents that are produced to support the application;
- I will provide the competent authority with access to all information at my disposal regarding the application, whether such information is favorable to the applicant or not
- All the particulars furnished by me in this form are true and correct;
- I will perform all other obligations as expected a palaeontological specialist in terms of the Act and the constitutions of my affiliated professional bodies; and
- I realize that a false declaration is an offense in terms of regulation 71 of the Regulations and is punishable in terms of section 24F of the NEMA.



Disclosure of Vested Interest

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

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CONTACT PERSON:

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SIGNATURE:





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

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

Requirements of Appendix 6 – GN R326 EIA Regulations of 7 April 2017	The relevant section in the report	Comment where not applicable.
1.(1) (a) (i) Details of the specialist who prepared the report	Page ii and Section 3 of Report – Contact details and company and Appendix A	-
(ii) The expertise of that person to compile a specialist report including a curriculum vita	Section 3 – refer to Appendix A	-
(b) A declaration that the person is independent in a form as may be specified by the competent authority	Page ii of the report	_
(c) An indication of the scope of, and the purpose for which, the report was prepared	Section 4 – Objective	-
(cA) An indication of the quality and age of base data used for the specialist report	Section 5 – Geological and Palaeontologic al history	-
(cB) a description of existing impacts on the site, cumulative impacts of the proposed development and levels of acceptable change;	Section 9	-



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

Requirements of Appendix 6 – GN R326 EIA Regulations of 7 April 2017	The relevant section in the report	Comment where not applicable.
(d) The duration, date and season of the site investigation and the relevance of the season to the outcome of the assessment	Section 1 & 10	
 (e) a description of the methodology adopted in preparing the report or carrying out the specialised process inclusive of equipment and modelling used 	Section 7 Approach and Methodology	-
(f) details of an assessment of the specifically identified sensitivity of the site related to the proposed activity or activities and its associated structures and infrastructure, inclusive of a site plan identifying site alternatives;	Section 1 & 10	
(g) An identification of any areas to be avoided, including buffers	Section 1 & 10	
(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 5 – Geological and Palaeontologic al history	
(i) A description of any assumptions made and any uncertainties or gaps in knowledge;	Section 7.1 – Assumptions and Limitation	-
 (j) A description of the findings and potential implications of such findings on the impact of the proposed activity, including identified alternatives, on the environment 	Section 1 & 10	
(k) Any mitigation measures for inclusion in the EMPr	Section 1 & 10	



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

Requirements of Appendix 6 – GN R326 EIA Regulations of 7 April 2017 (I) Any conditions for inclusion in the environmental authorisation (m) Any monitoring requirements for inclusion in the EMPr or environmental authorisation	The relevant section in the report Section 1 & 10	Comment where not applicable.
(n)(i) A reasoned opinion as to whether the proposed activity, activities or portions thereof should be authorised and	Section 1 & 10	
(n)(iA) A reasoned opinion regarding the acceptability of the proposed activity or activities; and		
(n)(ii) If the opinion is that the proposed activity, activities or portions thereof should be authorised, any avoidance, management and mitigation measures that should be included in the EMPr, and where applicable, the closure plan	Section 1 & 10	-
(o) A description of any consultation process that was undertaken during the course of carrying out the study	N/A	Not applicable. A public consultation process was handled as part of the Environmenta I Impact Assessment (EIA) and Environmenta



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

Requirements of Appendix 6 – GN R326 EIA Regulations of 7 April 2017	The relevant section in the report	Comment where not applicable.
		I Management Plan (EMP) process.
(p) A summary and copies of any comments that were received during any consultation process	N/A	Not applicable. To date, no comments regarding heritage resources that require input from a specialist have been raised.
(q) Any other information requested by the competent authority.	N/A	Not applicable.
(2) Where a government notice by the Minister provides for any protocol or minimum information requirement to be applied to a specialist report, the requirements as indicated in such notice will apply.	Section 2 compliance with SAHRA guidelines	



EXECUTIVE SUMMARY

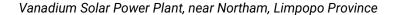
Banzai Environmental was appointed by Environamics Environmental Consultants to conduct the **Palaeontological Desktop Assessment** (PDA) to assess the Vanadium Power Plant (SPP), near Northam, Limpopo Province. In accordance with the National Environmental Management Act 107 of 1998 (NEMA) and to comply with the National Heritage Resources Act (No 25 of 1999, section 38) (NHRA), this PIA is necessary to confirm if fossil material could potentially be present in the planned development area, to evaluate the potential impact of the proposed development on the Palaeontological Heritage and to mitigate possible damage to fossil resources.

The Vanadium Solar Power Plant is underlain by Nebo Granite (Lebowa Granite Suite) and the Rustenburg Layered Suite of the Bushveld Complex as well as the Timeball Hill Formation of the Pretoria Group (Transvaal Supergroup). Updated geology (mapped by the Council of Geosciences, Pretoria) indicates that the development is underlain by Nebo Granite and the Bierkraal Subsuite as well as the Timeball Hill Formation (Pretoria Group, Transvaal Supergroup). The Palaeotechnical Report of the Limpopo Province (Groenewald et al, 2014) as well as the South African Heritage Resources Information System (SAHRIS) (Almond et al, 2013; SAHRIS website) allocates a Zero Palaeontological Sensitivity to the Bushveld Complex and a High to the Timeball Hill Formation. However, the igneous rocks of the Bushveld Complex probably compromised the original fossil content of the microbial stromatolites and microfossils by thermal metamorphosis.

It is thus considered that the proposed development will not lead to detrimental impacts on the palaeontological resources of the area. The construction of the development may therefore be authorised as the development footprint is not considered sensitive in terms of palaeontological resources.

Recommendations:

- The ECO for this project must be informed that the Timeball Hill Formation (Pretoria Group, Transvaal Supergroup) has a **High Palaeontological Sensitivity**.
- If Palaeontological Heritage is uncovered during surface clearing and excavations the Chance find Protocol attached should be implemented immediately. Fossil discoveries ought to be protected and the ECO/site manager must report to South African Heritage Resources Agency (SAHRA) (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za) so that mitigation (recording and collection) can be carried out.





 Before any fossil material can be collected from the development site the specialist involved would need to apply for a collection permit from SAHRA. Fossil material must be housed in an official collection (museum or university), while all reports and fieldwork should meet the minimum standards for palaeontological impact studies proposed by SAHRA (2012).

These recommendations should be incorporated into the Environmental Management Plan for the Vanadium Solar Power Plant



Impact Summary

Environmental	Issues	Rating	Average	Rating	Average
parameter		prior to		post	
		mitigati		mitigat	
		on		ion	
Planning Stage	No Impact		No Impact		No Impact
Construction Stage	Destroy or permanently	32	Negative	16	Low impact
Vanadium SPP	seal-in fossils at or below		Medium		
	the surface that are then		impact		
	no longer available for				
	scientific study				
Operational Phase	No Impact		No Impact		No Impact
Vanadium SPP					
Decommissioning	No Impact		No Impact		No Impact
Phase					
Vanadium SPP					
Construction Stage	Destroy or permanently	32	Negative	16	Low impact
Power line	seal-in fossils at or below		Medium		
Loss of fossil	the surface that are then		impact		
heritage	no longer available for				
	scientific study				
Power line	No Impact		No Impact		No Impact
Operational Phase					
Power Line	No Impact		No Impact		No Impact
Decommissioning					
Phase					

It is therefore considered that the proposed Vanadium SPP will not lead to detrimental impacts on the palaeontological reserves of the area. Thus, from a palaeontological point of view the construction of the development may be authorised in its whole extent.



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1 INTRODUCTION

Vanadium Solar Power Plant (RF) (Pty) Ltd proposes the development of the Vanadium Solar Power Plant near Northam, in the Limpopo Province (Figure 1-3, Table 2-3).

Table 2: General site information

Description of affected farm	Solar Power Plant
portion	Portion 1 of the farm Makayskraal No. 18,
	Portion 2 of the farm Zwartdoorns No. 421
	Power Line
	Portion 1 of the farm Makayskraal No. 18,
	Portion 1 of the farm Tusschenkomst No. 15
	Portion 2 of the farm Tusschenkomst No. 15
	Remaining Extent of the farm Nooitgedacht No. 11
	Portion 1 of the farm Nooitgedacht No. 11
	Remaining Extent of the Farm Morewag No. 921
Province	Limpopo
District Municipality	Waterberg District Municipality
Local Municipality	Thabazimbi Local Municipality
Ward numbers	7
Closest towns	Northam is located approximately 2km north of the
	proposed development.
21 Digit Surveyor General codes	Solar Power Plant
	Portion 1 of the farm Makayskraal No. 18
	T0JQ000000001800001
	Portion 2 of the farm Zwartdoorns No. 421
	T0KQ0000000042100002
	Power Line
	Portion 1 of the farm Makayskraal No. 18
	T0JQ0000000001800001
	Portion 1 of the farm Tusschenkomst No. 15
	T0JQ0000000001500001
	Portion 2 of the farm Tusschenkomst No. 15
	T0JQ0000000001500002
	Remaining Extent of the farm Nooitgedacht No. 11
	T0JQ0000000001100000
	Portion 1 of the farm Nooitgedacht No. 11



	T0JQ000000001100001
	Remaining Extent of the Farm Morewag No. 921
	T0JQ0000000092100000
Type of technology	Photovoltaic solar facility
Structure Height	- Panels ~6m
	- Buildings ~ 6m
	- Power line ~32m
	Battery storage facility ~ 8m
Surface area to be covered	Approximately 461 ha
(Development footprint)	
EIA Footprint (Area to be assessed)	Assessed as 645 ha
Structure orientation	The panels will either be fixed to a single-axis horizontal
	tracking structure where the orientation of the panel varies
	according to the time of the day, as the sun moves from
	east to west or tilted at a fixed angle equivalent to the
	latitude at which the site is in order to capture the most
	sun.
Generation capacity	Up to 250MW



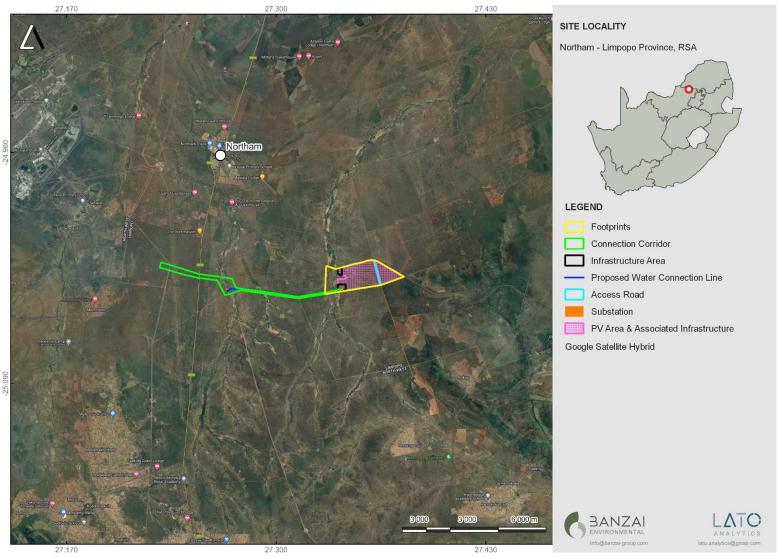


Figure 1:Regional locality of Vanadium Power Plant, near Northam, Limpopo Province.



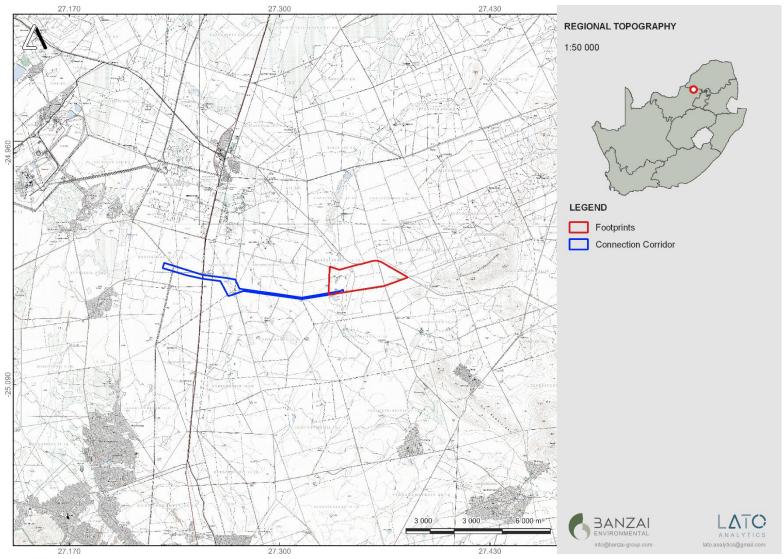


Figure 2: Locality of the Vanadium Power Plant, near Northam, Limpopo Province.



1.1 Technical Details

The term photovoltaic describes a solid-state electronic cell that produces direct current electrical energy from the radiant energy of the sun through a process known as the Photovoltaic Effect. This refers to light energy placing electrons into a higher state of energy to create electricity. Each PV cell is made of silicon (i.e., semiconductors), which is positively and negatively charged on either side, with electrical conductors attached to both sides to form a circuit. This circuit captures the released electrons in the form of an electric current (direct current). The key components of the proposed project are described below:

PV Panel Array

To produce up to 250MW, the proposed facility will require numerous linked cells placed behind a protective glass sheet to form a panel. Multiple panels will be required to form the solar PV arrays which will comprise the PV facility. The PV panels will be tilted at a northern angle in order to capture the most sun or using one-axis tracker structures to follow the sun to increase the Yield.

Wiring to Inverters

Sections of the PV array will be wired to inverters. The inverter is a pulse width mode inverter that converts direct current (DC) electricity to alternating current (AC) electricity at grid frequency.

Connection to the grid

Connecting the array to the electrical grid requires transformation of the voltage from 480V to 33kV to 132kV. The normal components and dimensions of a distribution rated electrical substation will be required. Output voltage from the inverter is 480V and this is fed into step up transformers to 132kV. An onsite substation will be required on the site to step the voltage up to 132kV, after which the power will be evacuated into the national grid via the proposed power line. Generation from the facility will tie in with a newly proposed collector substation to be connected to the national grid via one of the existing Eskom 275kV or 400kV lines from Spitskop 400/275/88/kV MTS Substation¹. The connection power line will be constructed within the limits of the grid connection corridor. The grid connection route will be assessed within 11 km long and a 150m wide (up to 1 km wide in some instances) corridor. The Project will inject up to 250MW into the National Grid. The installed capacity will be approximately 250MW.

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¹ Note from the developer: "We can only confirm that connection will take place within the corridor limits to the specified Eskom substation."



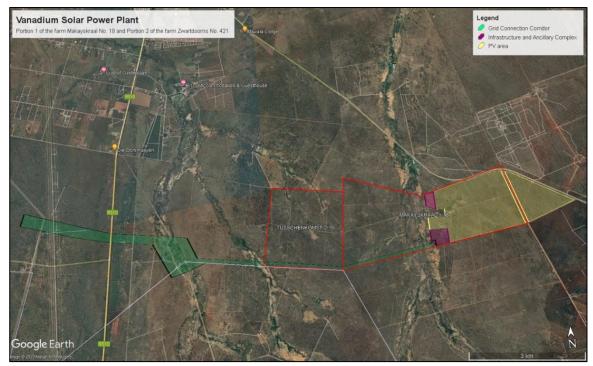


Figure 3: Power Line Corridor.

Electrical reticulation network

An internal electrical reticulation network will be required and will be lain ~2-4m underground as far as practically possible.

• Supporting Infrastructure

All associated infrastructure will be constructed within the limits of the infrastructure and ancillary complex.

Battery storage

A Battery Storage Facility with a maximum height of 8m and a maximum volume of 1,740 m³ of batteries and associated operational, safety and control infrastructure.

Roads

Access will be obtained from any point along the service road off of the R501 regional road to the west of the site. An internal site road network will also be required to provide access to the solar field and associated infrastructure. The access and internal roads will be constructed within a 25-meter corridor.

Fencing

For health, safety and security reasons, the facility will be required to be fenced off from the surrounding farm. Fencing with a height of 2.5 meters will be used.



Table 3: Technical details for the proposed facility

Component	Description / dimensions
Height of PV panels	6 meters
Area of PV Array	461 Hectares (Development footprint)
Number of inverters required	Minimum 50
Area occupied by inverter / transformer stations / substations / BESS	All associated infrastructure will be constructed within the limits of the infrastructure and ancillary complex. Substation: 3,35 ha Central inverters + LV/MV trafo: 750 m ²
Capacity of on-site substation	132kV
Capacity of the power line	132kV
Area occupied by both permanent and construction laydown areas	Permanent Laydown Area: 461 Hectares Construction Laydown Area: ~30.6 hectares
Area occupied by buildings	Infrastructure and ancillary complex 1: 20 ha Infrastructure and ancillary complex 2: 10.6 ha
Battery storage facility	Max Volume ~ 1740 m³ Max height ~ 8 m; Capacity ~ Up to 500 MW
Length of access roads (Service) ²	Service Road 1 Length: 1.2 km Service Road 2 Length: 1.64 Km Service Road 3 Length: 11.3 Km
Width of access roads (Services)	8 m – 10 m
Length of internal roads	TBC
Width of internal roads	4 m – 6 m
Length of perimeter roads	13.76 km
Width of perimeter roads	6 m – 8 m
Grid connection corridor width	150 m (up to 1km in some instances)

1.2 Consideration Of Alternatives

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

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 $^{^{\}rm 2}$ Note from the developer: Access will be obtained from any point along the service road. Banzai environmental (PTY) LTD.

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instances culminates in a single preferred project proposal. An initial site assessment was conducted by the developer the affected properties and the farm portions were found favorable due to its proximity to grid connections, solar radiation, ecology and relative flat terrain. These factors were then taken into consideration and avoided as far as possible.

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

No-go alternative

This alternative considers the option of 'do nothing' and maintaining the status quo. The site is currently zoned for agricultural and mining land uses. Should the proposed activity not proceed, the site will remain unchanged and will continue to be used for agricultural purposes. The potential opportunity costs in terms of alternative land use income through rental for energy facility and the supporting social and economic development in the area would be lost if the status quo persist.

Location alternatives

No other possible sites were identified on "Portion 1 of the farm Makayskraal No. 18 and Portion 2 of the farm Zwartdoorns No. 421. This site is referred to as the preferred site. Some limited sensitive features occur on the site. The size of the site makes provision for the exclusion of any sensitive environmental features that may arise through the EIA proses.

Technical alternatives: Powerlines

Generation from the facility will tie in with a newly proposed collector substation to be connected to the national grid via one of the existing Eskom 275kV or 400kV lines from Spitskop 400/275/88/kV MTS Substation. The connection power line will be constructed within the limits of the grid connection corridor³.

Battery storage facility

It is proposed that a nominal up to 500 MWh Battery Storage Facility for grid storage would be housed in stacked containers, or multi-storey building, with a maximum height of 8m and a maximum volume of 1,740 m³ of batteries and associated operational, safety and control infrastructure. Three types of battery technologies are being considered for the proposed project: Lithium-ion, Sodium-sulphur or Vanadium Redox flow battery. The preferred battery technology is Lithium-ion.

Battery storage offers a wide range of advantages to South Africa including renewable energy time shift, renewable capacity firming, electricity supply reliability and quality improvement, voltage

³ Note from the developer: At this stage, we can only confirm that connection will take place within the corridor limits to the specified Eskom substation.

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Vanadium Solar Power Plant, near Northam, Limpopo Province

regulation, electricity reserve capacity improvement, transmission congestion relief, load following and time of use energy cost management. In essence, this technology allows renewable energy to enter the base load and peak power generation market and therefore can compete directly with fossil

fuel sources of power generation and offer a truly sustainable electricity supply option.

Design and layout alternatives

Design alternatives will be considered throughout the planning and design phase.

Technology alternatives

There are several types of semiconductor technologies currently available and in use for PV solar panels. Two, however, have become the most widely adopted, namely crystalline silicon (Mono-facial and Bi-facial) and thin film. The technology that (at this stage) proves more feasible and reasonable with respect to the proposed solar facility is crystalline silicon panels, due to it being non-reflective, more efficient, and with a higher durability. However, due to the rapid technological advances being made in the field of solar technology the exact type of technology to be used, such as bifacial panels,

will only be confirmed at the onset of the project.

2 LEGAL MANDATE AND PURPOSE OF THE REPORT

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

Scoping and Environmental Impact Assessment process.

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



Table 4: Listed activities (SPPs)

Relevant	Activity	Description of each listed activity as per project description:	
notice:	No (s)		
GNR. 327 (as amended in 2017)	Activity 11(i)	 "The development of facilities or infrastructure for the transmission and distribution of electricity (i) outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts." Activity 11(i) is triggered as the proposed photovoltaic solar facility will transmit and distribute electricity of 132 kilovolts outside an urban area. 	
GNR. 327 (as amended in 2017)	Activity 24 (ii)	 "The development of a road (ii) with reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 meters." Activity 24(ii) is triggered as the internal roads will vary between 6 and 12 meters in width. 	
GNR. 327 (as amended in 2017)	Activity 28(ii)	 "Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture or afforestation on or after 1998 and where such development (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare." Activity 28(ii) is triggered as portions of the affected farm has been previously used for grazing and the property will be re-zoned to "special" use. 	
GNR. 327 (as amended in 2017)	Activity 56 (ii):	 "The widening of a road by more than 6 metres, or the lengthening of a road by more than 1 kilometre (ii) where no reserve exists, where the existing road is wider than 8 metres" Activity 56 (ii) is triggered as the existing access to the affected property does not have a reserve and will need to be widened by more than 6 metres. 	
GNR. 325 (as amended in 2017)	Activity 1	 "The development of facilities or infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more." Activity 1 is triggered since the proposed photovoltaic solar facility will generate up to 150 megawatts electricity through the use of a renewable resource. 	



GNR. 325 (as amended in 2017)	Activity 15	 "The clearance of an area of 20 hectares or more of indigenous vegetation." More than 20 hectares of indigenous vegetation will be cleared. 			
Relevant	Activity	Description of each listed activity as per project			
notice:	No (s)	description:			
GNR. 327 (as amended in 2017)	Activity 11(i)	 "The development of facilities or infrastructure for the transmission and distribution of electricity (i) outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts." Activity 11(i) is triggered as the proposed photovoltaic solar facility will transmit and distribute electricity of 132 kilovolts outside an urban area. 			
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The activities triggered under Listing Notice 1, 2 and 3 (Regulation 327, 325 and 324) for the project implies that the development is considered as potentially having an impact on the environment and therefore require the implementation of appropriate mitigation measures.

2.1 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
- 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.

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

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



3 OUALIFICATIONS AND EXPERIENCE OF THE AUTHOR

This study has been conducted by Mrs Elize Butler. 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.

4 OBJECTIVE

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

According to the "SAHRA 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.
- Identification of sensitive areas to be avoided (providing shapefiles/kmls) in the proposed development;



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

5 GEOLOGICAL AND PALAEONTOLOGICAL HISTORY

The geology of the proposed Vanadium Solar Power Plant near Northam in Limpopo is depicted on the 1: 250 000 Pretoria 2528 (1978) and the 2626 (1974) Thabazimbi Geological Map (Council for Geosciences, Pretoria). These maps indicate that the development is underlain by Nebo Granite (Mn) (Lebowa Granite Suite) and the Rustenburg Layered Suite (Vu, Vg) of the Bushveld Complex) as well as the Timeball Hill and Rooihoogte (Vro) Formations of the Pretoria Group (Transvaal Supergroup) (Figure 4, Table 5). Updated geology (mapped by the Council of Geosciences, Pretoria) is depicted in Figure 5 and indicates that the development is underlain by Nebo Granite and the Bierkraal Subsuite as well as the Timeball Hill Formation (Pretoria Group, Transvaal Supergroup). The Palaeotechnical Report of the Limpopo Province (Groenewald et al, 2014) as well as the South African Heritage Resources Information System (Figure 6) (SAHRIS) (Almond et al, 2013; SAHRIS website) allocates a Zero Palaeontological Sensitivity to the Bushveld Complex and a High Palaeontological Sensitivity to the Timeball Hill Formation (Table 7-8). However, the igneous rocks of the Bushveld Complex probably compromised the original fossil content of the microbial stromatolites and microfossils by thermal metamorphosis.

The Bushveld Complex comprise of the largest mafic intrusion in the world and underlie an area of almost 65 000 km². The maximum thickness of these rocks is almost 8 km while individual layers can be followed for about 150 km. This intrusion is world renowned for the ore reserves of platinum-group elements namely chromium and vanadium. The Bushveld Complex is divided in 4 groups namely the Lebowa Granite Suite, Rashoop Granophyre Suite, Rustenburg Layered Suite and Rooiberg Group (**Table 5**). The latter Group of felsic and minor volcanic rocks may be genetically



closer related to the Bushveld event as to the Transvaal Supergroup (Hutton and Schweitzer, 1995). The Rustenburg Layered Suite reveals a complete differentiation sequence of magma and is made up of various rock layers ranging from dunite, gabbro, norite, and pyroxenite, and anorthosite to magnetite and apatite- rich diorite.

Table 5: Currently accepted nomenclature and subdivisions of the Bushveld Complex (Cawthorn					
et al, 2006)					
Lebowa Granite Suite	Nebo, Makhutso, Klipkloof, Bobbejaanskop and Verena Granites				
Rashoop Granophyre	Stavoren and Diepkloof Granophyres, Rooikop Porphyritic Granite,				
Suite	Zwartbank Pseudogranophyre				
	Upper Zone	Subzone C (Ol-Ap diotite			
		Subzone B (Ol-Mt gabbronorite) Subzone A (Mt gabbronorite)			
Rustenburg Layered		Subzone / (ivit gubbronome)			
Suite	Main Zone Upper	Upper Subzone (gabbronorite) Lower Subzone (gabbronorite, norite)			
	Critical Zone	Upper Subzone (norite, anothosite, pyroxenite			
		Lower Subzone (pyroxenite)			
	Marginal Zone	Lower Subzone (pyroxenite) (norite)			
Rooiberg Group	tion (flow-banded rhyolite)				
	Kwaggasnek Formation (dacite, rhyolite)				
	Dullstroom Formation (basaltic andesite)				

The Timeball Hill Formation mantled by the superficial sediments comprises of conglomerates, diamictite, quartzite, minor lavas with lacustrine and fluvio-deltaic mudrocks, while the overlying Klapperkop Member of the Timeball Hill Formation consist of conglomerate, quartzite, shale and siltstone (Groenewald 2014). Catuneanu & Eriksson (2002) is of the opinion that the Timeball Hill Formation was deposited within a deep marine basin.

The Timeball Hill Formation is known to contain stromatolites and are associated with thin carbonate interbeds within turbidite sequences in the lower part of the formation (Catuneanu & Eriksson 2002). Stromatolites have not been recorded from the overlying fluvio-deltaic Klapperkop Quartzite Member. Other subunits in the Pretoria Group comprising stromatolites possibly also contain organic-walled microfossils.

Stromatolites are layered mounds, columns and sheet-like sedimentary rocks. These structures were originally formed by the growth of layer upon layer of cyanobacteria, a single-celled photosynthesizing microbe. Cyanobacteria are prokaryotic cells (simplest form of modern carbon-bases life). Stromatolites are first found in Precambrian rocks and are known as the earliest known





fossils. The oxygen atmosphere that we depend on was generated by numerous cyanobacteria photosynthesizing during the Archaean and Proterozoic Era.

Stromatolites and oolites from the Transvaal Supergroup have been described by various authors (Eriksson and Altermann, 1998). Detailed descriptions of South African Archaean stromatolites are available in the literature (Altermann, 1995; Altermann 2001; Buick, 2001; and Schopf, 2006).



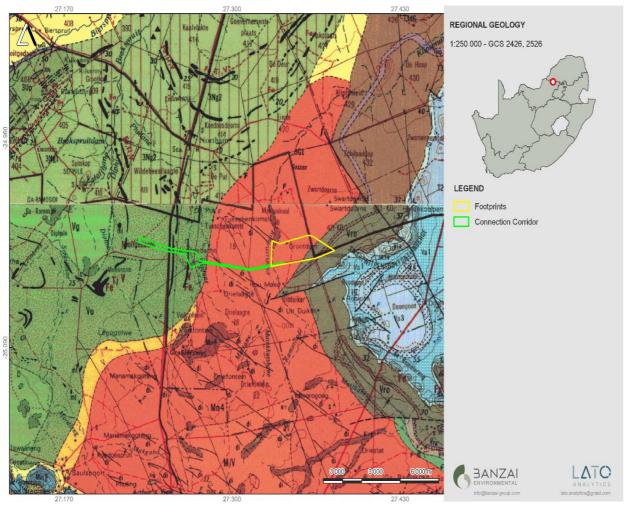


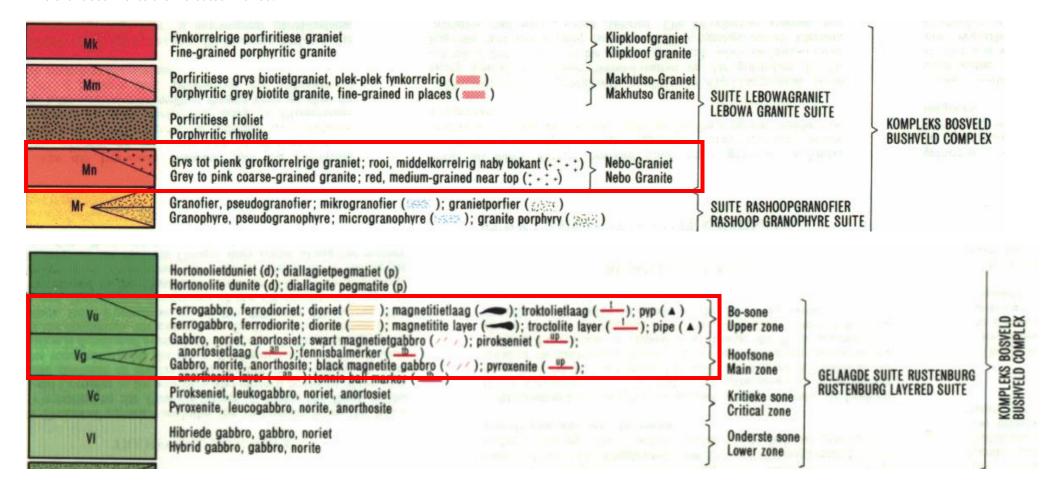
Figure 4: Extract of the 1: 250 000 Pretoria 2528 (1978) and the 2626 (1974) Thabazimbi Geological Maps (Council for Geosciences, Pretoria) indicating the geology of the proposed Vanadium Solar Power Plant near Northam in Limpopo.

The development is underlain by Nebo Granite (Lebowa Granite Suite) and the Rustenburg Layered Suite (Vu, Vg) of the Bushveld Complex, Mn) as well as the Timeball Hill and Rooihoogte Formation of the Pretoria Group.



Table 6:Legend of the 1: 250 000 Pretoria 2528 (1978) and the 2626 (1974) Thabazimbi Geological Maps (Council for Geosciences, Pretoria) indicating the geology of the proposed Vanadium Solar Power Plant near Northam, in Limpopo.

Relevant sediments are indicated in a red.





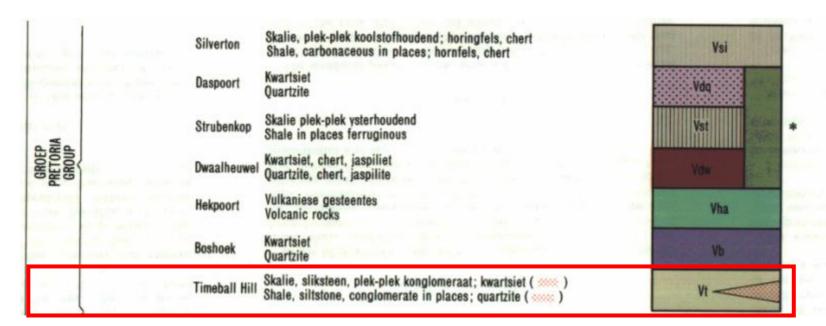




Table 7: Modified Extract of the Palaeotechnical Report of the Limpopo Province (Groenewald, et al., 2014).

BUSHVELD MAGMATIC PROVINCE / BUSHVELD COMPLEX diabase (Vdi) unnamed granophyre (VC) Rashoop Granophyre Suite (Vra) Croydon Subsuite (Vc) Dwars River Subsuite (Vdr) Dsjate Subsuite (Vds) Roossenekal Subsuite (Vrs) Lebowa Granite Suite (Vlg) Shelter Norite (Vsn)	Vdi; VC; Vra; Vc; Vdr; Vds; Vrs; Vlg; Vsh; Vsh1; Vmn; Vme; Vzo; Z; Z23; Z26; Vcr; Vdj; Vds; Vmt1;	Intrusive igneous rocks Late Vaalian / Early Proterozoic 2.06 Ga Mafic intrusives of Rustenberg Layered Suite Intrusive granites & granophyres		No fossils recorded		Bushveld Complex has been described as "One of the great geological wonders of the world" – the largest layered igneous complex in the world with the richest reserves of platinum group metals knowr anywhere. Intruded between Magaliesberg Fm quartzites (Pretoria Group) and the Rooiberg Group volcanics.
	Dwaalheuwel (Vdw, Vhd)		Alluvial sandstones, conglomerates and mudro	cks	No fossils recorded	
	Hekpoort (Vh, Vhd, Vha)		Volcanics (basalts, pyroclastics) with minor lact shales	ustrine	No fossils recorded	ALERT FOR POTENTIALLY FOSSILIFEROUS
	Boshoek (Vb)		Sandstones, conglomerats, diamictite (alluvial	fans,	No fossils recorded	LATE CAENOZOIC CAVE BRECCIAS WITHIN OUTCROP AREA OF CARBONATE SUBUNITS
	Timeball Hill (Vt; Vti)	Klapperkop (Vkp)	Lacustrine and fluvio-deltaic mudrocks with diamictite, conglomerates, quartzite, minor lavas. Shale, siltstone, conglomerate, quartzite		Stromatolites	- i.e. LIMESTONES & DOLOMITES (breccias not individually mapped)
	Rooihoogte (Vt)		Basal breccio-conglomerates, quartzites, mudri carbonates (alluvial fan, lakes, karst infill)	ocks,	No fossils recorded	
	Duitschland (Vd)		Conglomerate		No fossils recorded	
	Penge (Vp; Vpe)		Iron-rich shale		Stromatolites	

The Palaeotechnical Report (Groenewald et al., 2014) indicates that the Vanadium Solar Power Plant is underlain by sediments with a Zero (grey) and High (orange) Palaeontological Sensitivity (**Table 7**).



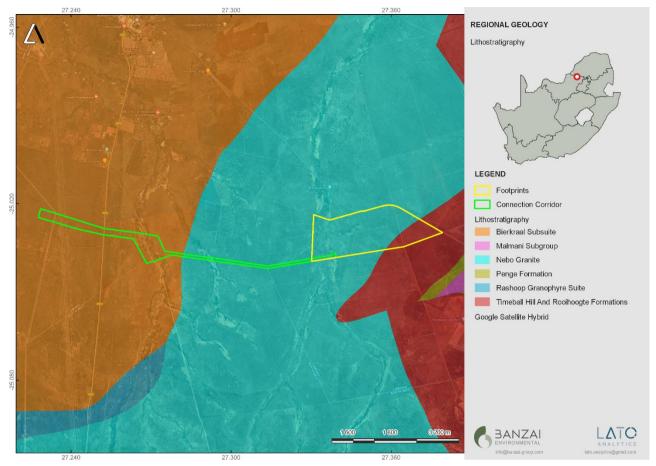


Figure 5: The updated Geology (Council of Geosciences, Pretoria) indicates that the proposed development is underlain by the Nebo Granite and the Bierkraal Subsuite of the Bushveld Complex.



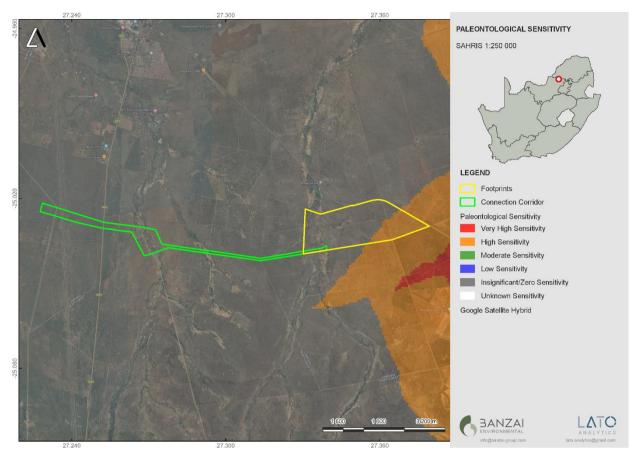


Figure 6: Extract of the 1: 250 000 SAHRIS PalaeoMap map (Council of Geosciences) indicating the proposed Vanadium Solar development.

The SAHRIS Palaeosensitivity map (**Figure 6**) indicates that the proposed *Vanadium SPP development is underlain by sediments with a Zero (grey) and High(orange) Palaeontological Sensitivity.*

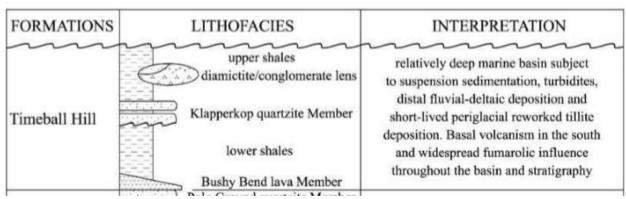


Figure 7: Stratigraphy and depositional settings if the Timeball Hill Formation at the base of the Pretoria succession (Catuneanu and Eriksson 2002).



Table 8: 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.			



Cumulative Effects

The term "Cumulative Effect" has for the purpose of this report been defined as: the summation of effects over time which can be attributed to the operation of the project itself, and the overall effects on the ecosystem of the site that can be attributed to the project and other existing and planned future projects.

The geographic area of evaluation is the spatial boundary in which the cumulative effects analysis was undertaken. The spatial boundary evaluated in this cumulative effects analysis generally includes an area of a 30km radius surrounding the proposed development – refer to below.

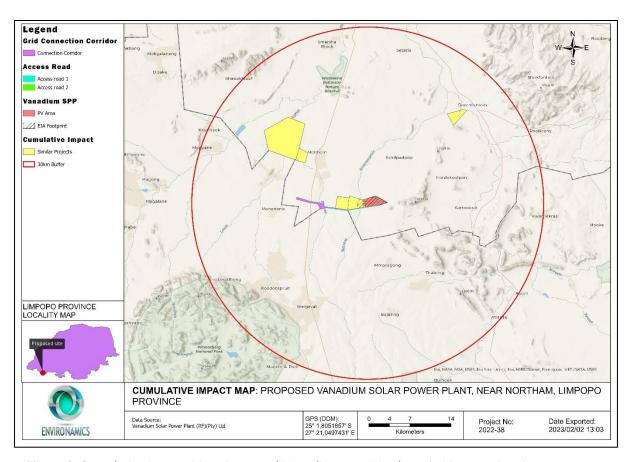


Figure 8: Cumulative Impact Map: Proposed Vanadium near Northam, in Limpopo Province.

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



A temporal boundary is the timeframe during which the cumulative effects are reasonably expected to occur. The temporal parameters for these cumulative effects analysis is the anticipated lifespan of the Proposed Project, beginning in 2024 and extending out at least 20 years, which is the minimum expected project life of the proposed project. Where appropriate, particular focus is on near-term cumulative impacts of overlapping construction schedules for proposed projects in the area of evaluation.

Table 9:A summary of related facilities, that may have a cumulative impact, in a 30 km radius of the Vanadium SPP.

Site	Distance	Proposed	DEFF Reference	EIA Process	Project status
	from Study	generating			
	Area	capacity			
Portion 10 of the	10km	40 MW	12/12/20/2129	Scoping and	Approved
farm				EIA	
Wildebeestlaagte					
411 KQ					
Portion 5 of the	11km	30 MW	12/12/20/2526	Scoping and	In process
farm Grootkuil				EIA	
409 K.Q					
Farm Liverpool	23.5km	10 MW	14/12/16/3/1/969	BAR	Approved
543 KQ Portion 2					
Farm Liverpool	23.5km	10 MW	14/12/16/3/3/1/969	BAR	Approved
543 KQ Portion 2					
Spitskp Solar	10km	0 MW	14/12/16/3/3/2/702	Scoping and	In process
Park				EIA	
Vanadium SPP ⁴	0 km	250MW	To be confirmed	Scoping and	In process
				EIA	

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

⁴ Environamics is the EAP appointed for the project. The project is still in process. BANZAI ENVIRONMENTAL (PTY) LTD.



The general Palaeontological Sensitivity of the area is Low to High (see SAHRIS Palaeomap (**Figure 6**). 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 Zero and Very High.

6 GEOGRAPHICAL LOCATION OF THE SITE

Northam is located approximately 2km north of the proposed development (Figure 1-3).

7 METHODS

The aim of a desktop study is to evaluate the possible risk to palaeontological heritage in the proposed development. This includes all trace fossils as well as all fossils in the proposed footprint. All possible information is consulted to compile a desktop study, and this includes the following: all Palaeontological Impact Assessment reports in the same area; aerial photos and Google Earth images, topographical as well as geological maps.

7.1 Assumptions and Limitations

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

Comparable Assemblage Zones in other areas is also used to provide information on the existence of fossils in an area which has not documented in the past. When using similar Assemblage Zones and geological formations for Desktop studies it is generally **assumed** that exposed fossil heritage is present within the footprint. A field-assessment will thus improve the accuracy of the desktop assessment.

8 ADDITIONAL INFORMATION CONSULTED

In compiling this report the following sources were consulted:

- Geological map 1:100 000, Geology of the Republic of South Africa (Visser 1984)
- A Google Earth map with polygons of the proposed development was obtained from Environamics.
- 1:250 000 Pretoria 2528 (1978) and the 2626 (1974) Thabazimbi Geological Map (Council for Geosciences, Pretoria).
- Palaeotechnical report of the Limpopo Province (Groenewald et al, 2014)
- Updated Geology (Council for Geosciences, Pretoria).



9 IMPACT ASSESSMENT METHODOLOGY

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

Significance is determined through a synthesis of impact characteristics which include context and intensity of an impact. Context refers to the geographical scale i.e., site, local, national or global whereas intensity is defined by the severity of the impact e.g., the magnitude of deviation from background conditions, the size of the area affected, the duration of the impact and the overall probability of occurrence. Significance is calculated as shown in Table 4.1.

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.

Impact Rating System

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

- planning
- construction
- operation
- decommissioning

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

Table	Table 10:The rating system.				
NATU	NATURE				
Loss	Loss of fossil heritage.				
GEO	GEOGRAPHICAL EXTENT				
This i	This is defined as the area over which the impact will be experienced.				
1	Site	The impact will only affect the site.			
2	Local/district	Will affect the local area or district.			
3	Province/region	Will affect the entire province or region.			
4	International and National	Will affect the entire country.			
PROE	PROBABILITY				
This describes the chance of occurrence of an impact.					



1	Unlikely	The chance of the impact occurring is extremely low
1	Offlikely	
•	B 311	(Less than a 25% chance of occurrence).
2	Possible	The impact may occur (Between a 25% to 50% chance of
		occurrence).
3	Probable	The impact will likely occur (Between a 50% to 75%
		chance of occurrence).
4	Definite	Impact will certainly occur (Greater than a 75% chance of
		occurrence).
DUR	ATION	·
This	describes the duration of the	impacts. Duration indicates the lifetime of the impact as a result
of the	e proposed activity.	
1	Short term	The impact will either disappear with mitigation or will be
		mitigated through natural processes in a span shorter
		than the construction phase (0 - 1 years), or the impact
		will last for the period of a relatively short construction
		period and a limited recovery time after construction,
		thereafter it will be entirely negated $(0 - 2 \text{ years})$.
2	Medium term	The impact will continue or last for some time after the
		construction phase but will be mitigated by direct human
		action or by natural processes thereafter (2 – 10 years).
3	Long term	The impact and its effects will continue or last for the
		entire operational life of the development, but will be
		mitigated by direct human action or by natural processes
		thereafter (10 – 30 years).
4	Permanent	The only class of impact that will be non-transitory.
		Mitigation either by man or natural process will not occur
		in such a way or such a time span that the impact can be
		considered indefinite.
INTE	NSITY/ MAGNITUDE	
	ribes the severity of an impa	ct.
1	Low	Impact affects the quality, use and integrity of the
		system/component in a way that is barely perceptible.
2	Medium	Impact alters the quality, use and integrity of the
_		system/component but system/component still
		continues to function in a moderately modified way and
		maintains general integrity (some impact on integrity).
3	High	
3	підії	Impact affects the continued viability of the system/
		component and the quality, use, integrity and



		functionality of the system or component is severely			
		impaired and may temporarily cease. High costs of rehabilitation and remediation.			
4	Very high	Impact affects the continued viability of the			
	very mgn	system/component and the quality, use, integrity and			
		functionality of the system or component permanently			
		ceases and is irreversibly impaired. Rehabilitation and			
		remediation often impossible. If possible rehabilitation			
		·			
		and remediation often unfeasible due to extremely high			
		costs of rehabilitation and remediation.			
	SIBILITY				
	-	npact can be successfully reversed upon completion of the			
	ed activity.				
1	Completely reversible	The impact is reversible with implementation of minor			
		mitigation measures.			
2	Partly reversible	The impact is partly reversible but more intense			
		mitigation measures are required.			
3	Barely reversible	The impact is unlikely to be reversed even with intense			
		mitigation measures.			
4	Irreversible	The impact is irreversible and no mitigation measures			
		exist.			
IRREPL	ACEABLE LOSS OF RESOURCES				
This de	scribes the degree to which reso	ources will be irreplaceably lost as a result of a proposed			
activity.					
1	No loss of resource	The impact will not result in the loss of any resources.			
2	Marginal loss of resource	The impact will result in marginal loss of resources.			
3	Significant loss of resources	The impact will result in significant loss of resources.			
4	Complete loss of resources	The impact is result in a complete loss of all resources.			
CUMUL	ATIVE EFFECT				
This de:	scribes the cumulative effect of t	he impacts. A cumulative impact is an effect which in itself			
may no	t be significant but may become	significant if added to other existing or potential impacts			
emanat	emanating from other similar or diverse activities as a result of the project activity in question.				
1	Negligible cumulative impact	The impact would result in negligible to no cumulative			
		effects.			
2	Low cumulative impact	The impact would result in insignificant cumulative			
	·	effects.			
3	Medium cumulative impact	The impact would result in minor cumulative effects.			
4	High cumulative impact	The impact would result in significant cumulative effects			
i .	g	past sala . sala signinaliti damalative effects			



SIGNIFICANCE

Significance is determined through a synthesis of impact characteristics. Significance is an indication of the importance of the impact in terms of both physical extent and time scale, and therefore indicates the level of mitigation required. The calculation of the significance of an impact uses the following formula: (Extent + probability + reversibility + irreplaceability + duration + cumulative effect) x magnitude/intensity.

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
6 to 28	Negative low impact	The anticipated impact will have negligible negative effects and will require little to no mitigation.
6 to 28	Positive low impact	The anticipated impact will have minor positive effects.
29 to 50	Negative medium impact	The anticipated impact will have moderate negative effects and will require moderate mitigation measures.
29 to 50	Positive medium impact	The anticipated impact will have moderate positive effects.
51 to 73	Negative high impact	The anticipated impact will have significant effects and will require significant mitigation measures to achieve an acceptable level of impact.
51 to 73	Positive high impact	The anticipated impact will have significant positive effects.
74 to 96	Negative very high impact	The anticipated impact will have highly significant effects and are unlikely to be able to be mitigated adequately. These impacts could be considered "fatal flaws".
74 to 96	Positive very high impact	The anticipated impact will have highly significant positive effects.

Table 11:Summary of Impacts

(Extent + probability + reversibility + irreplaceability + duration + cumulative effect) x magnitude/intensity

	Extent	Duration	Magnitude	Reversibility	Irreplicable	Cumulative	Impact
					loss	effect	
	1	4	1	4	4	3	16



10 FINDINGS AND RECOMMENDATIONS

The Vanadium Solar Power Plant is underlain by Nebo Granite (Lebowa Granite Suite) and the Rustenburg Layered Suite of the Bushveld Complex as well as the Timeball Hill Formation of the Pretoria Group (Transvaal Supergroup). Updated geology (mapped by the Council of Geosciences, Pretoria) indicates that the development is underlain by Nebo Granite and the Bierkraal Subsuite as well as the Timeball Hill Formation (Pretoria Group, Transvaal Supergroup). The Palaeotechnical Report of the Limpopo Province (Groenewald et al, 2014) as well as the South African Heritage Resources Information System (SAHRIS) (Almond *et al*, 2013; SAHRIS website) allocates a Zero Palaeontological Sensitivity to the Bushveld Complex and a High to the Timeball Hill Formation. However, the igneous rocks of the Bushveld Complex probably compromised the original fossil content of the microbial stromatolites and microfossils by thermal metamorphosis.

It is thus considered that the proposed development will not lead to detrimental impacts on the palaeontological resources of the area. The construction of the development may therefore be authorised as the development footprint is not considered sensitive in terms of palaeontological resources.

Recommendations:

- The ECO for this project must be informed that the Timeball Hill Formation (Pretoria Group, Transvaal Supergroup) has a High Palaeontological Sensitivity.
- If Palaeontological Heritage is uncovered during surface clearing and excavations the **Chance find**Protocol attached should be implemented immediately. Fossil discoveries ought to be protected and the

 ECO/site manager must report to South African Heritage Resources Agency (SAHRA) (Contact details:

 SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462

 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za) so that mitigation (recording and collection) can
 be carried out.
- Before any fossil material can be collected from the development site the specialist involved would need to apply for a collection permit from SAHRA. Fossil material must be housed in an official collection (museum or university), while all reports and fieldwork should meet the minimum standards for palaeontological impact studies proposed by SAHRA (2012).

These recommendations should be incorporated into the Environmental Management Plan for the Vanadium Solar Power Plant



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Appendix A - Elize Butler CV

PROFESSION: Palaeontologist

YEARS' EXPERIENCE: 30 years in Palaeontology

EDUCATION: B.Sc Botany and Zoology, 1988

University of the Orange Free State

B. Sc (Hons) Zoology, 1991

University of the Orange Free State

Management Course, 1991

University of the Orange Free State

M. Sc. Cum laude (Zoology), 2009

University of the Free State

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

MEMBERSHIP

Palaeontological Society of South Africa (PSSA) 2006-currently

EMPLOYMENT HISTORY

Part-time Laboratory assistant Department of Zoology & Entomology University of the

Free State Zoology 1989-1992

Part-time laboratory assistant Department of Virology

University of the Free State Zoology 1992

Research Assistant National Museum, Bloemfontein 1993 – 1997

Principal Research Assistant National Museum, Bloemfontein

and Collection Manager 1998-currently

TECHNICAL REPORTS

Butler, E. 2014. Palaeontological Impact Assessment of the proposed development of private dwellings on portion 5 of farm 304 Matjesfontein Keurboomstrand, Knysna District, Western Cape Province. Bloemfontein. Butler, E. 2014. Palaeontological Impact Assessment for the proposed upgrade of existing water supply infrastructure at Noupoort, Northern Cape Province. 2014. Bloemfontein.



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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.

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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.

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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.

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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.

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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.

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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.

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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.

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Butler, E. 2017. Palaeontological Desktop Assessment of the proposed development of the new open cast mining operations of the Impunzi mine in the Mpumalanga Province. Bloemfontein.

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Butler, E. 2017. Palaeontological Desktop Assessment of the proposed development of the Lephalale coal and power project, Lephalale, Limpopo Province, Republic of South Africa. Bloemfontein.

Butler, E. 2017. Palaeontological Impact Assessment of the proposed construction of a 132KV powerline from the Tweespruit distribution substation (in the Mantsopa local municipality) to the Driedorp rural substation (within the Naledi local municipality), Free State province. Bloemfontein.

Butler, E. 2017. Palaeontological Desktop Assessment of the proposed development of the new coal-fired power plant and associated infrastructure near Makhado, Limpopo Province. Bloemfontein.

Butler, E. 2017. Palaeontological Impact Assessment of the proposed construction of a Photovoltaic Solar Power station near Collett substation, Middelburg, Eastern Cape. Bloemfontein.

Butler, E. 2017. Palaeontological Impact Assessment for the proposed township establishment of 2000 residential sites with supporting amenities on a portion of farm 826 in Botshabelo West, Mangaung Metro, Free State Province. Bloemfontein.

Butler, E. 2017. Palaeontological Desktop Assessment for the proposed prospecting right project without bulk sampling, in the Koa Valley, Northern Cape Province. Bloemfontein.

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Butler, E. 2017. Palaeontological Impact Assessment of the proposed Belvior aggregate quarry II on portion 7 of the farm Maidenhead 169, Enoch Mgijima Municipality, division of Queenstown, Eastern Cape. Bloemfontein.

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Butler, E. 2017. Palaeontological Impact Assessment of the proposed construction of Tina Falls Hydropower and associated power lines near Cumbu, Mthlontlo Local Municipality, Eastern Cape. Bloemfontein.

Butler, E. 2017. Palaeontological Desktop Assessment of the proposed construction of the Mangaung Gariep Water Augmentation Project. Bloemfontein.

Butler, E. 2017. Palaeontological Impact Assessment of the proposed Belvoir aggregate quarry II on portion 7 of the farm Maidenhead 169, Enoch Mgijima Municipality, division of Queenstown, Eastern Cape. Bloemfontein.

Butler, E. 2017. Palaeontological Impact Assessment of the proposed construction of the Melkspruit-Rouxville 132KV Power line. Bloemfontein.

Butler, E. 2017. Palaeontological Desktop Assessment of the proposed development of a railway siding on a Portion of portion 41 of the farm Rustfontein 109 is, Govan Mbeki local municipality, Gert Sibande district municipality, Mpumalanga Province. Bloemfontein.



Butler, E. 2017. Palaeontological Impact Assessment of the proposed consolidation of the proposed Ilima Colliery in the Albert Luthuli local municipality, Gert Sibande District Municipality, Mpumalanga Province. Bloemfontein.

Butler, E. 2017. Palaeontological Desktop Assessment of the proposed extension of the Kareerand Tailings Storage Facility, associated borrow pits as well as a storm water drainage channel in the Vaal River near Stilfontein, North West Province. Bloemfontein.

Butler, E. 2017. Palaeontological Desktop Assessment of the proposed construction of a filling station and associated facilities on the Erf 6279, district municipality of John Taolo Gaetsewe District, Ga-Segonyana Local Municipality Northern Cape. Bloemfontein.

Butler, E. 2017. Palaeontological Desktop Assessment of the proposed of the Lephalale Coal and Power Project, Lephalale, Limpopo Province, Republic of South Africa. Bloemfontein.

Butler, E. 2017. Palaeontological Desktop Assessment of the proposed Overvaal Trust PV Facility, Buffelspoort, North West Province. Bloemfontein.

Butler, E. 2017. Palaeontological Impact Assessment of the proposed development of the H₂ Energy Power Station and associated infrastructure on Portions 21; 22 And 23 of the farm Hartebeestspruit in the Thembisile Hani Local Municipality, Nkangala District near Kwamhlanga, Mpumalanga Province. Bloemfontein.

Butler, E. 2017. Palaeontological Impact Assessment of the proposed upgrade of the Sandriver Canal and Klippan Pump station in Welkom, Free State Province. Bloemfontein.

Butler, E. 2017. Palaeontological Impact Assessment of the proposed upgrade of the 132kv and 11kv power line into a dual circuit above ground power line feeding into the Urania substation in Welkom, Free State Province. Bloemfontein.

Butler, E. 2017. Palaeontological Desktop Assessment of the proposed Swaziland-Mozambique border patrol road and Mozambique barrier structure. Bloemfontein.

Butler, E. 2017. Palaeontological Impact Assessment of the proposed diamonds alluvial & diamonds general prospecting right application near Christiana on the remaining extent of portion 1 of the farm Kaffraria 314, registration division HO, North West Province. Bloemfontein.

Butler, E. 2017. Palaeontological Desktop Assessment for the proposed development of Wastewater Treatment Works on Hartebeesfontein, near Panbult, Mpumalanga. Bloemfontein.

Butler, E. 2017. Palaeontological Desktop Assessment for the proposed development of Wastewater Treatment Works on Rustplaas near Piet Retief, Mpumalanga. Bloemfontein.

Butler, E. 2018. Palaeontological Impact Assessment for the Proposed Landfill Site in Luckhoff, Letsemeng Local Municipality, Xhariep District, Free State. Bloemfontein.

Butler, E. 2018. Palaeontological Impact Assessment of the proposed development of the new Mutsho coal-fired power plant and associated infrastructure near Makhado, Limpopo Province. Bloemfontein.

Butler, E. 2018. Palaeontological Impact Assessment of the authorisation and amendment processes for Manangu mine near Delmas, Victor Khanye local municipality, Mpumalanga. Bloemfontein.

Butler, E. 2018. Palaeontological Desktop Assessment for the proposed Mashishing township establishment in Mashishing (Lydenburg), Mpumalanga Province. Bloemfontein.

Butler, E. 2018. Palaeontological Desktop Assessment for the Proposed Mlonzi Estate Development near Lusikisiki, Ngquza Hill Local Municipality, Eastern Cape. Bloemfontein.

Butler, E. 2018. Palaeontological Phase 1 Assessment of the proposed Swaziland-Mozambique border patrol road and Mozambique barrier structure. Bloemfontein.

Butler, E. 2018. Palaeontological Desktop Assessment for the proposed electricity expansion project and Sekgame Switching Station at the Sishen Mine, Northern Cape Province. Bloemfontein.

Butler, E. 2018. Palaeontological field assessment of the proposed construction of the Zonnebloem Switching Station (132/22kV) and two loop-in loop-out power lines (132kV) in the Mpumalanga Province. Bloemfontein. Butler, E. 2018. Palaeontological Field Assessment for the proposed re-alignment and de-commissioning of the Firham-Platrand 88kv Powerline, near Standerton, Lekwa Local Municipality, Mpumalanga province. Bloemfontein.

Butler, E. 2018. Palaeontological Desktop Assessment of the proposed Villa Rosa development In the Buffalo City Metropolitan Municipality, East London. Bloemfontein.

Butler, E. 2018. Palaeontological field Assessment of the proposed Villa Rosa development In the Buffalo City Metropolitan Municipality, East London. Bloemfontein.

Butler, E. 2018. Palaeontological desktop assessment of the proposed Mookodi – Mahikeng 400kV line, North West Province. Bloemfontein.

Butler, E. 2018. Palaeontological Desktop Assessment for the proposed Thornhill Housing Project, Ndlambe Municipality, Port Alfred, Eastern Cape Province. Bloemfontein.



Butler, E. 2018. Palaeontological desktop assessment of the proposed housing development on portion 237 of farm Hartebeestpoort 328. Bloemfontein.

Butler, E. 2018. Palaeontological desktop assessment of the proposed New Age Chicken layer facility located on holding 75 Endicott near Springs in Gauteng. Bloemfontein.

Butler, E. 2018 Palaeontological Desktop Assessment for the development of the proposed Leslie 1 Mining Project near Leandra, Mpumalanga Province. Bloemfontein.

Butler, E. 2018. Palaeontological field assessment of the proposed development of the Wildealskloof mixed use development near Bloemfontein, Free State Province. Bloemfontein.

Butler, E. 2018. Palaeontological Field Assessment of the proposed Megamor Extension, East London. Bloemfontein

Butler, E. 2018. Palaeontological Impact Assessment of the proposed diamonds Alluvial & Diamonds General Prospecting Right Application near Christiana on the Remaining Extent of Portion 1 of the Farm Kaffraria 314, Registration Division HO, North West Province. Bloemfontein.

Butler, E. 2018. Palaeontological Impact Assessment of the proposed construction of a new 11kV (1.3km) Power Line to supply electricity to a cell tower on farm 215 near Delportshoop in the Northern Cape. Bloemfontein.

Butler, E. 2018. Palaeontological Field Assessment of the proposed construction of a new 22 kV single wood pole structure power line to the proposed MTN tower, near Britstown, Northern Cape Province. Bloemfontein. Butler, E. 2018. Palaeontological Exemption Letter for the proposed reclamation and reprocessing of the City Deep Dumps in Johannesburg, Gauteng Province. Bloemfontein.

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Butler, E. 2018. Proposed Kalabasfontein Mine Extension project, near Bethal, Govan Mbeki District Municipality, Mpumalanga. Bloemfontein.

Butler, E. 2018. Palaeontological Desktop Assessment for the development of the proposed Leslie 1 Mining Project near Leandra, Mpumalanga Province. Bloemfontein.

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Butler, E. 2018. Environmental Impact Assessment (EIA) for the Proposed 325mw Rondekop Wind Energy Facility between Matjiesfontein and Sutherland in the Northern Cape Province.

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Butler, E., 2019. Palaeontological Desktop Assessment of the proposed Westrand Strengthening Project Phase II

Butler, E., 2019. Palaeontological Field Assessment for the proposed Sirius 3 Photovoltaic Solar Energy Facility near Upington, Northern Cape Province

Butler, E., 2019. Palaeontological Field Assessment for the proposed Sirius 4 Photovoltaic Solar Energy Facility near Upington, Northern Cape Province

Butler, E., 2019. Palaeontological Field Assessment for Heuningspruit PV 1 Solar Energy Facility near Koppies, Ngwathe Local Municipality, Free State Province.

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