



PALAEONTOLOGICAL IMPACT ASSESSMENT

PROPOSED 300MW LEEUWSPRUIT
SOLAR 2 PHOTOVOLTAIC
PROJECT SOUTH OF KROONSTAD,
FREE STATE PROVINCE

2023

COMPILED for: Nemai Consulting CC



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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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 2 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 2 – 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 – Methods and Terms of Reference	-
(cA) An indication of the quality and age of base data used for the specialist report	Section 5 – Geological and Palaeontological 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;8 & 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 4 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 Palaeontological history	-
(i) A description of any assumptions made and any uncertainties or gaps in knowledge;	Section 4.1 – 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 and 10	-
(k) Any mitigation measures for inclusion in the EMPr	Section 11	-



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.
(l) Any conditions for inclusion in the environmental authorisation	Section 11	-
(m) Any monitoring requirements for inclusion in the EMPr or environmental authorisation	Section 11	-
(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 and 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 Environmental Impact Assessment (EIA) and Environmental



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.
		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 3 compliance with SAHRA guidelines	



EXECUTIVE SUMMARY

Banzai Environmental was appointed by Nemai Consulting CC to conduct the Palaeontological Impact Assessment (PIA) to assess the 300MW Leeuwspruit Solar 2 Photovoltaic (PV) Renewable Energy Project south of Kroonstad in the Free State 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 resources and to mitigate possible damage to fossil resources.

The study area is underlain by Quaternary aeolian sand in the centre of the development, while the Adelaide Subgroup (Beaufort Group, Karoo Supergroup) is present in the east and a small portion of the development is underlain by Jurassic Dolerite. The PalaeoMap of the South African Heritage Resources Information System (SAHRIS) indicates that the Palaeontological Sensitivity of Quaternary sands is Moderate, the Adelaide Subgroup has a Very High Palaeontological Sensitivity while the Jurassic Dolerite is igneous in origin and has a Zero Palaeontological Sensitivity (Almond and Pether, 2009; Almond *et al.*, 2013). The Palaeontological Sensitivity generated by the National Environmental Web-Based Screening indicates that the Sensitivity of the proposed development is Very High. Updated Geology (Council of Geosciences) refines the geology and indicates that the proposed development is underlain by the alluvium, colluvium, eluvium and gravel as well as the Balfour Formation of the Adelaide Subgroup (Beaufort Group) (Groenewald *et al.*, 2014). Two Layout alternatives have been proposed for the project. Layout Alternative One is the original layout and Alternative Two has been revised after specialist input. As the geology of the two layouts are the same there are no preference between the alternatives from a Palaeontological Perspective.

A site-specific field survey of the development footprint was conducted on foot and by motor vehicle on 13 May 2023. No fossiliferous outcrop was detected in the proposed development. This could be attributed to the lack of outcrops as well as the lush grassy vegetation in the area. Based on the site investigation as well as desktop research it is concluded that fossil heritage of scientific and conservational interest in the development footprint is rare. This is in contrast with the High Sensitivity allocated to the development area by the SAHRIS Palaeosensitivity Map and DFFE Screening Tool. **A medium Palaeontological Significance has been allocated for the construction phase of the PV development pre-mitigation and a low significance post mitigation.** The construction phase will be the only development phase impacting Palaeontological Heritage and **no significant impacts are expected to impact the Operational and Decommissioning phases.** As the No-Go Alternative considers the option of 'do nothing' and maintaining the status quo, it will have a Neutral impact on the Palaeontological Heritage of the development. The **Cumulative impacts of the development near Kroonstad is considered to be Low and falls within the acceptable limits for the**



project. It is therefore considered that the proposed development will not lead to damaging impacts on the palaeontological resources of the area. **The construction of the development may thus be permitted in its whole extent, as the development footprint is not considered sensitive in terms of palaeontological resources.** It is consequently recommended that no further palaeontological heritage studies, ground truthing and/or specialist mitigation are required pending the discovery of newly discovered fossils.

If fossil remains are discovered during any phase of construction, either on the surface or exposed by excavations the **Chance Find Protocol** must be implemented by the ECO/site manager in charge of these developments. These discoveries ought to be protected (if possible, *in situ*) and the ECO/site manager must report to 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 carry out by a paleontologist.

Preceding any collection of fossil material, the specialist would need to apply for a collection permit from SAHRA. Fossil material must be curated in an accredited collection (museum or university collection), while all fieldwork and reports should meet the minimum standards for palaeontological impact studies suggested by SAHRA.

Impact Summary

Environmental parameter	Issues	Rating prior to mitigation	Average	Rating post mitigation	Average
Planning Phase Leeuwspruit Solar 2 PV Facility Layout Alternative 1	No Impact	0	No Impact	0	No Impact
Construction Stage Leeuwspruit Solar 2 PV Facility Loss of fossil heritage	Destroy or permanently seal-in fossils at or below the surface that are then	48	Negative Medium impact	16	Negative Low impact



Layout Alternative 1	no longer available for scientific study				
Operational Phase Leeuwspruit Solar 2 PV Facility Layout Alternative 1	No Impact	0	No Impact	0	No Impact
Decommissioning Phase Leeuwspruit Solar 2 PV Facility Layout Alternative 1	No Impact	0	No Impact	0	No Impact
Planning Phase Leeuwspruit Solar 2 PV Facility Layout Alternative 2	No Impact	0	No Impact	0	No Impact
Construction Stage Leeuwspruit Solar 2 PV Facility Loss of fossil heritage Layout Alternative 2	Destroy or permanently seal-in fossils at or below the surface that are then no longer available for scientific study	48	Negative Medium impact	16	Negative Low impact
Operational Phase Leeuwspruit Solar 2 PV Facility Layout Alternative 2	No Impact	0	No Impact	0	No Impact
Decommissioning Phase Leeuwspruit Solar 2 PV Facility	No Impact	0	No Impact	0	No Impact



Layout Alternative 2					
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It is therefore considered that the proposed Leeuwspruit Solar 2 PV Facility is deemed appropriate and will not lead to detrimental impacts on the palaeontological reserves of the area. Thus, the construction of the development may be authorised in its whole extent.



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1 INTRODUCTION

Nemai Consulting CC (Nemai) was appointed by Leeuwspruit Solar 2 (Pty) Ltd (the “Applicant”) to conduct the Environmental Impact Assessment (EIA) for the proposed 300MW Solar Photovoltaic (PV) Project south of Kroonstad, in the Free State Province (the “Project”) (Figure 1-2).

The electricity generated by the Project will be transferred via 132kV powerlines from the facility substation to a new 132/400 kV Main Transmission Substation (MTS). The Applicant intends to bid for the current and future Renewable Energy Independent Power Producer Procurement Programme (REIPPPP) bid windows and/or other renewable energy markets within SA.

1.1 Technical description

The Project consists of the following systems, sub-systems or components (amongst others):

- PV modules and mounting structures which will consist of either Monofacial or Bifacial PV panels, mounted on either fixed-tilt, single-axis tracking, and/or double-axis tracking systems.
- Inverters and transformers.
- Battery Energy Storage System (BESS) area up to 5ha.
- Operation and Maintenance buildings including a gate house and security building, control centre, offices, warehouses and workshops for storage and maintenance.
- Facility grid connection infrastructure, including:
 - 33kV cabling between the project components and the facility substation
 - A 132kV facility substation
 - 33kV or 132kV cabling or powerline between the facility substation and the proposed Main Transmission Substation.
- Temporary construction laydown area up to 7 ha.
- Permanent laydown area up to 1 ha (to be located within the area demarcated for the temporary construction laydown).
- Internal roads will be up to 6 m wide, to allow access to the Solar PV modules for operations and maintenance activities.
- Main access road is up to 8 m wide. The site is accessible via the N1.



Table 2: Property details

Farm Name	21-digit Surveyor General (SG) Code
PV Site	
MOOIDRAAI 953 PORTION 0	F02000000000095300000
LEEUWSPRUIT 659 PORTION 0	F02000000000065900000
WOLVEKOP 314 PORTION 0	F02000000000031400000
Access Road	
LEEUWSPRUIT WEST 666 PORTION 1	F02000000000066600001
LEEUWSPRUIT WEST 666 REM EXTENT	F02000000000066600000
Power Line Route	
MOOIDRAAI 953 PORTION 0	F02000000000095300000
OSLAAGTE 2564 PORTION 0	F020000000000256400000



Table 3: Technical details of the proposed PV Plant

No.	Component	Description / Dimensions
1.	Height of PV panels	± Up to 5.5 m
2.	Area of PV Array	Up to approximately 440ha
3.	Area occupied by substations	Up to 1ha
4.	Capacity of on-site substation	The facility substation will collect the power from the facility and transform it from medium voltage (up to 33 kV) to high voltage (132 kV)
5.	BESS	Area up to ± 5ha
6.	Area occupied by both permanent and construction laydown areas	Temporary: Up to 5ha Permanent: Up to 1 ha (located within the area demarcated for temporary construction laydown)
7.	Area occupied by buildings	Up to 1.5ha
8.	Length of internal roads	Up to 33km
9.	Width of internal roads	The internal roads will be up to 6 m wide. The access roads will be up to 8 m wide.
10.	Proximity to grid connection	Approximately 10 km
11.	Height of fencing	Up to 3.5m
12.	Type of fencing	Type will vary around the site, welded mesh, palisade and electric fencing

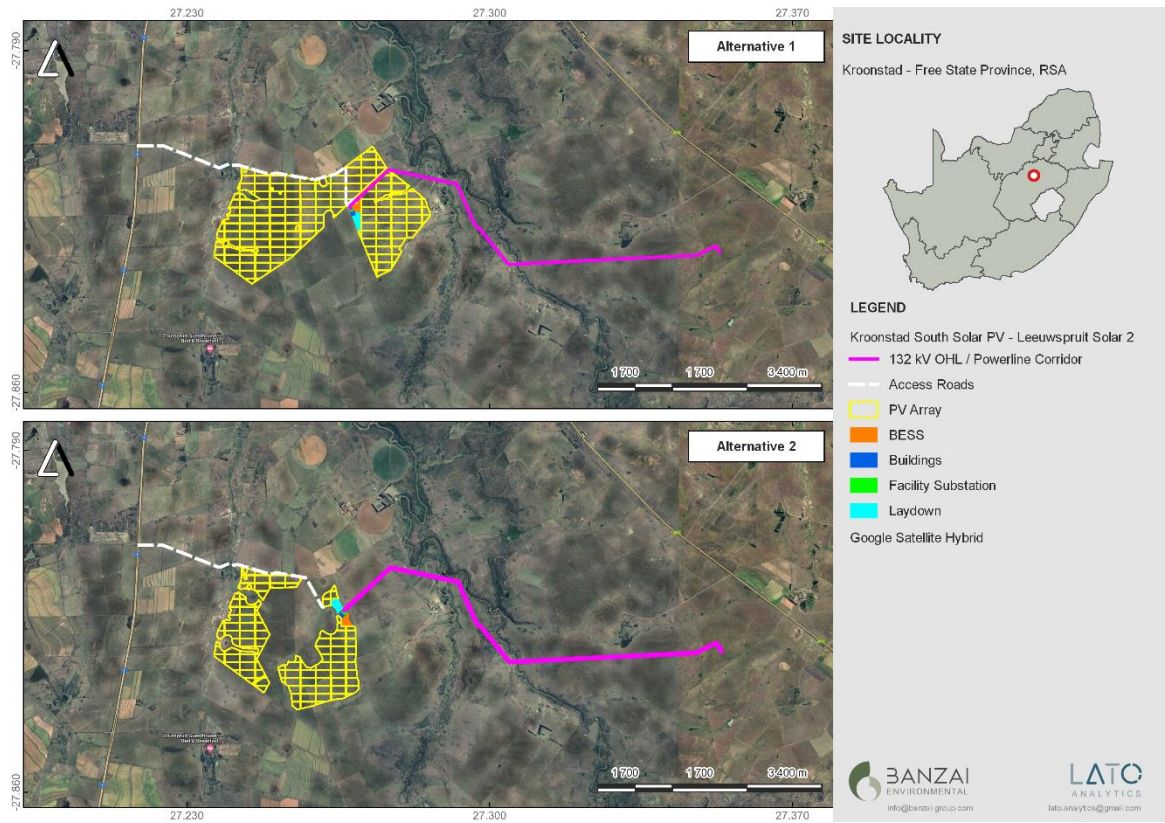


Figure 1: Regional locality Map of the proposed Leeuwspruit Solar 2 PV Facility south of Kroonstad in the Free State Province.

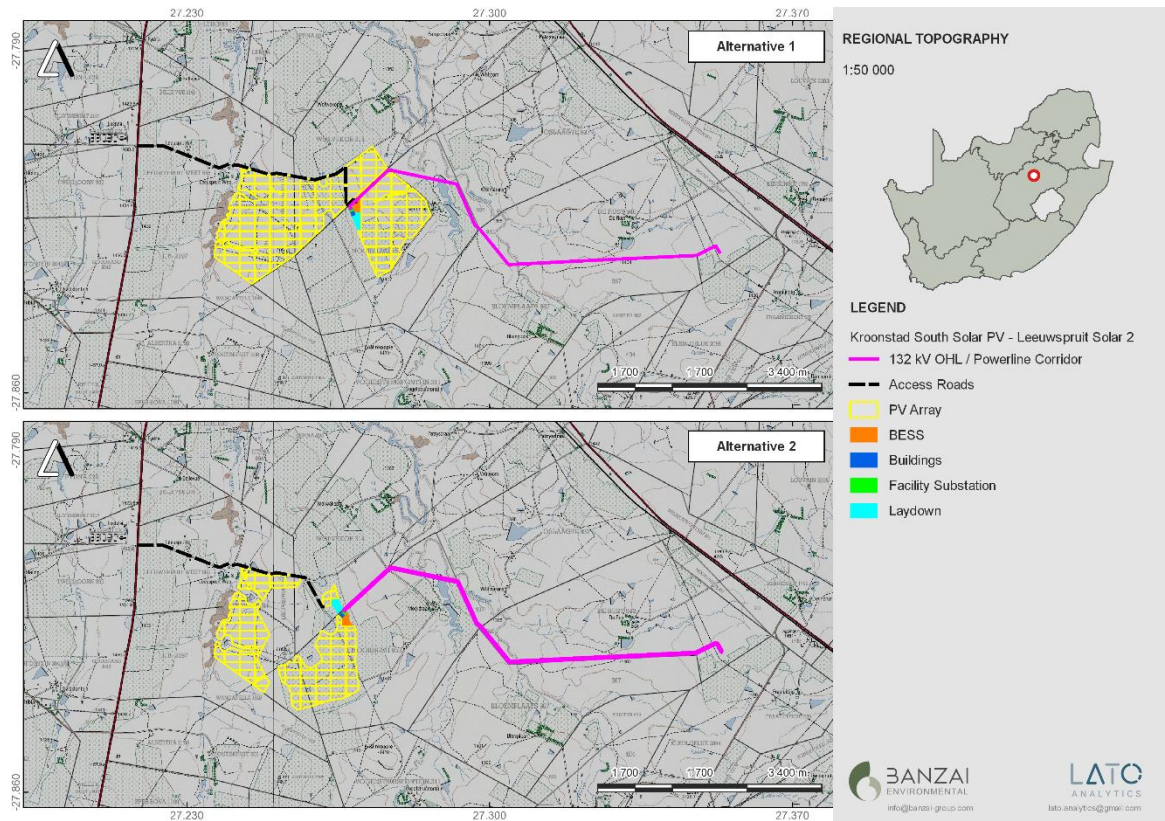


Figure 2: Locality map of the proposed Leeuwspruit Solar 2 PV Facility south of Kroonstad in the Free State Province.



2 QUALIFICATIONS AND EXPERIENCE OF THE AUTHOR

This study has been conducted by Mrs Elize Butler. She has conducted approximately 300 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-eight years. She has experience in locating, collecting, and curating fossils. She has been a member of the Palaeontological Society of South Africa (PSSA) since 2006 and has been conducting PIAs since 2014.

3. LEGISLATION

National Heritage Resources Act (25 of 1999)

Cultural Heritage in South Africa, includes all heritage resources, is protected by the National Heritage Resources Act (Act 25 of 1999) (NHRA). Heritage resources as defined in Section 3 of the Act include **“all objects recovered from the soil or waters of South Africa, including archaeological and palaeontological objects and material, meteorites and rare geological specimens”**.

The identification, evaluation and assessment of any cultural heritage site, artefact or finds in the South African context is required and governed by the following legislation:

- National Environmental Management Act (NEMA) Act 107 of 1998
- National Heritage Resources Act (NHRA) Act 25 of 1999
- Minerals and Petroleum Resources Development Act (MPRDA) Act 28 of 2002
- Notice 648 of the Government Gazette 45421- general requirements for undertaking an initial site sensitivity verification where no specific assessment protocol has been identified.

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

GNR 982 (Government Gazette 38282, 14 December 2014) promulgated under the National Environmental Management Act (NEMA) Act 107 of 1998

- Basic Assessment Report (BAR) – Regulations 19 and 23
- Environmental Impacts Assessment (EIA) – Regulation 23
- Environmental Scoping Report (ESR) – Regulation 21
- Environmental Management Programme (EMPr) – Regulations 19 and 23



National Heritage Resources Act (NHRA) Act 25 of 1999

- Protection of Heritage Resources – Sections 34 to 36
- Heritage Resources Management – Section 38

MPRDA Regulations of 2014

Environmental reports to be compiled for application of mining right – Regulation 48

- Contents of scoping report – Regulation 49
- Contents of environmental impact assessment report – Regulation 50
- Environmental management programme – Regulation 51
- Environmental management plan – Regulation 52

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.

4. METHODS AND TERMS OF REFERENCE

The present field-based PIA assesses the potential impacts on Fossil Heritage on the development. This study forms part of the Heritage Impact Assessment Report. According to the "SAHRA APM Guidelines: Minimum Standards for the Archaeological and Palaeontological Components of Impact Assessment Reports" the purpose of the PIA is: 1) to identify the palaeontological importance of the rock formations in the footprint; 2) to evaluate the palaeontological magnitude of the formations; 3) to clarify the **impact** on fossil heritage; and 4) to suggest how the developer might protect and lessen possible damage to fossil heritage.

The palaeontological status of each rock section is calculated as well as the possible impact of the development on fossil heritage by a) the palaeontological importance of the rocks, b) the type of development and c) the quantity of bedrock removed.

All possible information is consulted to compile a scoping report, and this includes the following: Provisional DFFE Screening Tool, SAHRIS Palaeosensitivity map, all Palaeontological Impact Assessment reports in the same area; aerial photos and Google Earth images, topographical and geological maps as well as scientific articles of specimens from the development area and Assemblage Zones.

When the development footprint has a moderate to high palaeontological sensitivity a field-based assessment is necessary. The desktop and the field survey of the exposed rock determine the impact significance of the planned development and recommendations for further studies or mitigation are made. Destructive impacts on palaeontological heritage usually only occur during the construction phase while the excavations will change the current topography and destruct or permanently seal-in fossils at or below the ground surface. Fossil Heritage will then no longer be accessible for scientific research.

During a site investigation the palaeontologist does not only survey the development but also tries to determine the density and diversity of fossils in the development area. This is confirmed by examining representative exposures of fossiliferous rocks (sedimentary rocks contain fossil heritage whereas igneous and metamorphic rocks are mostly unfossiliferous). Rock exposures that are investigated usually contains a large portion of the stratigraphic unit, can be accessed easily and comprise of



unweathered (fresh) exposed rock. These exposures may be natural (rocky outcrops in stream or river banks, cliffs, dongas) but could also be artificial (quarries, open building excavations and even railway and road cuttings). It is common practice for palaeontologist to log well-preserved fossils (GPS, and stratigraphic data) during field assessment studies.

Mitigation usually precedes construction or may occur during construction when potentially fossiliferous bedrock is exposed. Mitigation comprises the collection and recording of fossils. Preceding excavation of any fossils, a permit from SAHRA must be obtained and the material will have to be housed in a permitted institution. When mitigation is applied correctly, a positive impact is possible as knowledge of local palaeontological heritage may be increased.

The fossil potential of the Leeuwspruit Solar 2 PV development area was determined by criss-crossing the development footprint and by physically investigating all bedrock outcrops to determine the lithology and fossil content of the outcrops. Fossils occurring at the surface is very unpredictable and a representative sample size of the area has been investigated. However, it is important to note that the absence of fossils in a development footprint does not necessarily mean that palaeontological significant material is not present on site (on or beneath ground surface).

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 impacts that result from the incremental impact of the proposed activity on a common resource when added to the impacts of other past, present or reasonably foreseeable future activities.
- Fair assessment of alternatives (infrastructure alternatives have been provided):
- Recommend mitigation measures to minimise the impact of the proposed development; and
- Implications of specialist findings for the proposed development (such as permits, licenses etc).

4.1 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.



5. GEOLOGICAL AND PALAEOLOGICAL HISTORY

The geology of the proposed Leeuwspruit Solar 2 PV south of Kroonstad in the Free State is depicted on the 1: 250 000 Kroonstad 2726 (2000) Geological Map (Council for Geosciences, Pretoria) (**Figure 3, Table 4**). This map indicates that the study area is underlain by Quaternary aeolian sand (Qs, yellow), the Adelaide Subgroup (Pa, green) (Beaufort Group, Karoo Supergroup) as well as Jurassic Dolerite (Karoo Igneous Province; Jd, red). The PalaeoMap (**Figure 4, Table 5**) of the South African Heritage Resources Information System (SAHRIS) indicates that the Palaeontological Sensitivity of Quaternary sands is Moderate (green), that of the Adelaide Subgroup is Very High (red) while the Jurassic Dolerite is igneous in origin and has a Zero (grey) Palaeontological Sensitivity (Almond and Pether, 2009; Almond *et al.*, 2013). The potential fossiliferous sedimentary bedrocks of the Adelaide Subgroup could have been thermally metamorphized by overlying dolerite sills compromising their palaeontological sensitivity. The Palaeontological Sensitivity generated by the National Environmental Web-Based Screening (depicted in **Figure 5**) indicates that the Sensitivity of the proposed development is Very High. Updated Geology (Council of Geosciences) indicates that the proposed development is underlain by the alluvium, colluvium, eluvium and gravel as well as the Balfour Formation of the Adelaide Subgroup (Beaufort Group) (**Figure 6**, Groenewald *et al.*, 2014).

Two Layout alternatives have been proposed for the project. Layout Alternative One is the original layout proposed by the developer while Alternative Two has been revised after specialist input. As the geology of the two layouts are the same there are no preference between the alternatives from a Palaeontological Perspective.

Quaternary superficial deposits are the youngest geological deposits formed during the most recent period (approximately 2.6 million years ago to present). Most of the superficial deposits are unconsolidated sediments and consist of calcretes, sand, silt and clay, and they form relatively thin, often discontinuous patches of sediments. The Quaternary deposits reveal palaeoclimatic changes in the geological formations (Hunter *et al.*, 2006). The climatic fluctuations in the Cenozoic Era were responsible for the formation of most geomorphologic features (Maud, 2012). Various warming and cooling events occurred in the Cenozoic but climatic changes during the Quaternary, specifically the last 1.8 Ma, were the most drastic climate changes relative to all climate variations in the past Barnosky (2005). Climate in the Quaternary Period were both drier and wetter than the present and resulted in changes in river flow patterns, sedimentation processes and vegetation variation (Tooth *et al.*, 2004).

The fossil assemblages of this Group are generally very low in diversity, but locally high and occur over a wide range. Quaternary deposits are especially important when in fluvial environments along



water courses (pale yellow, single bird figure, present in the development). These fossils represent terrestrial plants and animals with a close resemblance to living forms. Fossil assemblages include diatoms, gastropod shells, bivalves, ostracods and trace fossils as well as mammalian bones and teeth as well as coprolites, freshwater molluscs and plant microfossils). Various authors have described fossilized hyena burrows in Late Pleistocene alluvial sediments of the Modder River (Broom 1909 a, b; Cooke 1955; Churchill et al. 2000; Rossouw 2006). Fossilized hyena lairs are occasionally located outside the present river valleys along localized spring deposits and calcified pan dunes (Scott & Brink 1991). Fossiliferous sediments (local peat deposits) occur within calcified pan dunes in this region (Horowitz et al. 1978; Scott and Klein 1981; Butzer 1984). These types of pans formed when the prevailing winds blew aeolian sands (unconsolidated material) into newly formed lunettes on the lee side of the deflation hollows and sometimes provided a site for hyena burrows and prehistoric human habitation.

Pleistocene vertebrate fossils and plant microfossils are associated with spring and pan deposits [e.g., Florisbad, (northwest of Bloemfontein, Baden Baden (north of Dealesville,) Liebenbergspan (Voigts Post), Deelpan between Bloemfontein and Petrusburg) (Brink 1987, 1988; Scott & Rossouw 2005)]. Florisbad has been declared a Provincial Heritage Site while Erfkroon is another valuable fossil site along the Modder River. Fossils in these areas occur over large areas in erosion gullies. Stone artefacts from the earlier part of the Middle Stone Age and the Later Stone Age have also been uncovered and are sometimes associate with bones (Churchill et al. 2000). The palaeontology of the Quaternary superficial deposits has been relatively neglected in the past. Late Cenozoic calcrete may comprise of bones, horn corns as well as mammalian teeth. Tortoise remains have also been uncovered as well as trace fossils which includes termite and insect's burrows and mammalian trackways. Amphibian and crocodile remains have been uncovered where the depositional settings in the past were wetter.

The Karoo igneous province (Jd-red) is one of the world's classic continental basalt (CFB) provinces. This province consists of intrusive and extrusive rocks that occur over a large area (Duncan et al, 2006). Generally, the flood basalts do not contribute to prominent volcanic structures, but instead are formed by successive eruptions from a set of fissures that form sub-horizontal lava flows (sills and dykes) varying in thickness. This lava caps the landscape on which they erupted. As the Karoo is an old flood basalt province it is today preserved as erosional fragments of a more extensive lava cap that covered much of southern Africa in the geological past. It is estimated that the Karoo lava outcrop currently covered at least 140 000 km² while it was larger in the past [~2 000 000 km² (Cox 1970, 1972)].

The Karoo Igneous Province contains a large volume of flood basalts as well as silicic volcanic rocks. These units are comprised of rhyodacite and rhyolitic magma and crops out along the Lebombo



monocline. Individual units span up to 60 km and sometimes show massive pyroclastic structures and are thus classified as rheognimbrites. The basal lavas lie conformable on the Clarens Formation but in specific localities sandstone erosion occurred before the volcanic eruptions took place. Lock *et al* (1974) found evidence in the Eastern Cape that in the early stages of volcanism magma interacted with ground water to produce volcanoclastic deposits as well as phreatic and phreatomagmatic diatremes. Eales *et al* (1984) also found evidence of aqueous environments during early volcanism by the existence of pillow lavas and associated hyaloclastite breccias and thin lenses of fluviatile sandstones interbedded with the lowermost magmas.

Underlying the superficial deposits is a series of Karoo sandstones, mudstones, and shales, that was deposited under fluvial environments of the Adelaide Subgroup (Beaufort Group). The Beaufort Group is the third of the main subdivisions of the Karoo Supergroup. The Beaufort group overlays the Ecca Group and consists essentially of sandstones and shales, deposited in the Karoo Basin from the Middle Permian to the early part of the Middle Triassic periods and was deposited on land through alluvial processes. The Beaufort Group covers a total land surface area of approximately 200 000 km² in South Africa and is the first fully continental sequence in the Karoo Supergroup and is divided into the Adelaide and the overlying Tarkastad Subgroups (**Figure 7**). The Adelaide subgroup rocks are deposited under a humid climate that allowed for the establishment of wet floodplains with high water tables and are interpreted to be fluvio-lacustrine sediments. The Adelaide Subgroup is approximately 5 000m thick in the southeast, but this decreases to about 800m in the centre of the basin which decreases to about 100 to 200m in the north.

The Adelaide Subgroup contains alternating greyish-red, bluish-grey, or greenish grey mudrocks in the southern and central parts of the Karoo Basin with very fine to medium-grained, grey lithofeldspathic sandstones. Thicker sandstones of the Adelaide are usually multi-storey and usually have cut-and-fill features. The sandstones are characterized internally by horizontal lamination together with parting lineation and less frequent trough crossbedding as well as current ripple lamination. The bases of the sandstone units are extensive beds, while ripple lamination is usually confined to thin sandstones towards the top of the thicker units. The mudrocks of the Adelaide Subgroup usually have massive and blocky weathering. Sometimes desiccation cracks and impressions of raindrops are present. In the mudstones of the Beaufort Group calcareous nodules and concretions occur throughout.

The flood plains of the Beaufort Group (Karoo Supergroup) are internationally renowned for the early diversification of land vertebrates and provide the worlds' most complete transition from early "reptiles" to mammals. The Beaufort Group is subdivided into a series of biostratigraphic units based on its faunal content (Kitching 1977, 1978; Keyser *et al*, 1977, Rubidge 1995, Smith *et al*, 2020; Viglietti 2020) (**Figure 7**). A portion of the proposed development is underlain by the Balfour Formation



(**Figure 5**) which is divided in the *Daptocephalus* (DAZ) which in turn is divided in the upper (younger) *Lystrosaurus maccaigi* - *Moschorhinus* and lower (older) *Dicynodon-Theriongnathus* Subzones (**Figure 7-12**; Viglietti, 2020). The potential fossiliferous sedimentary bedrocks of the Balfour Formation could have been thermally metamorphized by overlying dolerite sills compromising their palaeontological sensitivity.

The dicynodont, *Daptocephalus leoniceps* is the main biozone defining fossil of the *Daptocephalus* Assemblage Zone (**Figure 8**). The *Daptocephalus* Assemblage Zone (DaAZ) is characterised by the co-occurrence of the dicynodontoid *Daptocephalus leoniceps*, the therocephalian *Theriongnathus* microps, and the cynodont *Procynosuchus delaharpeae*. The DaAZ comprise of two subzones representing the two distinct faunal assemblages in this assemblage zone. The *Dicynodon - Theriongnathus* Subzone (**Figure 9**) (in co-occurrence with *Daptocephalus*) is present in the lower *Daptocephalus* Assemblage Zone while the *Lystrosaurus maccaigi* – *Moschorhinus kitchingi* Subzone (**Figure 10**) is present in the upper DaAZ. The defining taxa of the latter subzone is *L. maccaigi*, *Daptocephalus* and *Moschorhinus*. This Zone is characterized by the co-occurrence of the two therapsids namely *Dicynodon* and *Theriongnathus* (**Figure 9**). The *Daptocephalus* Assemblage Zone of the Beaufort Group shows the greatest vertebrate diversity and includes numerous well-preserved genera and species of dicynodonts, biarmosuchians, gorgonopsian, therocephalian and cynodont therapsid Synapsida. Captorhinid Reptilia are also present while eosuchian Reptilia, Amphibia and Pisces are rarer in occurrence. Trace fossils of vertebrates and invertebrates as well as *Glossopteris* flora plants have also been described.

The *Daptocephalus* Assemblage Zone (AZ) expands into the lower Palingkloof of the Upper Balfour Formation. The lower Palingkloof Member is of special importance as it precedes the Permo-Triassic Extinction Event which destroyed the vertebrate fauna and extinguished the diverse glossopterid plants. The lower *Lystrosaurus declivis* AZ forms part of the Katberg Formation. Fauna and flora from this assemblage zone is rare as few genera survived the Permo-Triassic Extinction Event. The *Lystrosaurus declivis* AZ is characterized by the dicynodont, *Lystrosaurus*, and captorhinid reptile, *Procolophon*, biarmosuchian and gorgonopsian Therapsida that did not survive into the *Lystrosaurus* Assemblage Zone although the therocephalian and cynodont Therapsida are present in moderate quantities. Captorhinid Reptilia is reduced, but this interval is characterised by a unique diversity of oversized amphibians while fossil fish, millipedes and diverse trace fossils have also been recorded.

The proposed development is largely underlain by the Volksrust Formation (Ecca Group). This Formation is mostly an argillaceous unit that overlies the Vryheid Formation of the Beaufort Group. The Volksrust Formation is about 150-270 m thick and deposits correlate with that of the Fort Brown and Waterford Formations in the south (Snyman 1996). This Formation consists of basinal grey to black, silty shale with thin, usually bioturbated, siltstone or sandstone lenses and beds, particularly



towards its upper and lower boundaries. Thin phosphate and carbonate beds and concretions are relatively common. These deposits may also be lacustrine or even lagoonal (Cairncross et al 1998). This sequence contains important fossils but are rarely recorded. Fossils from the Volksrust Formation include rare temnospondyl amphibian remains, invertebrates, petrified wood, and low-diversity marine to non-marine trace fossil assemblages. Minor coals with plant remains have been found in this Formation. The bivalve *Megadesmus* has been documented from the Volksrust Formation (Bamford 2011).

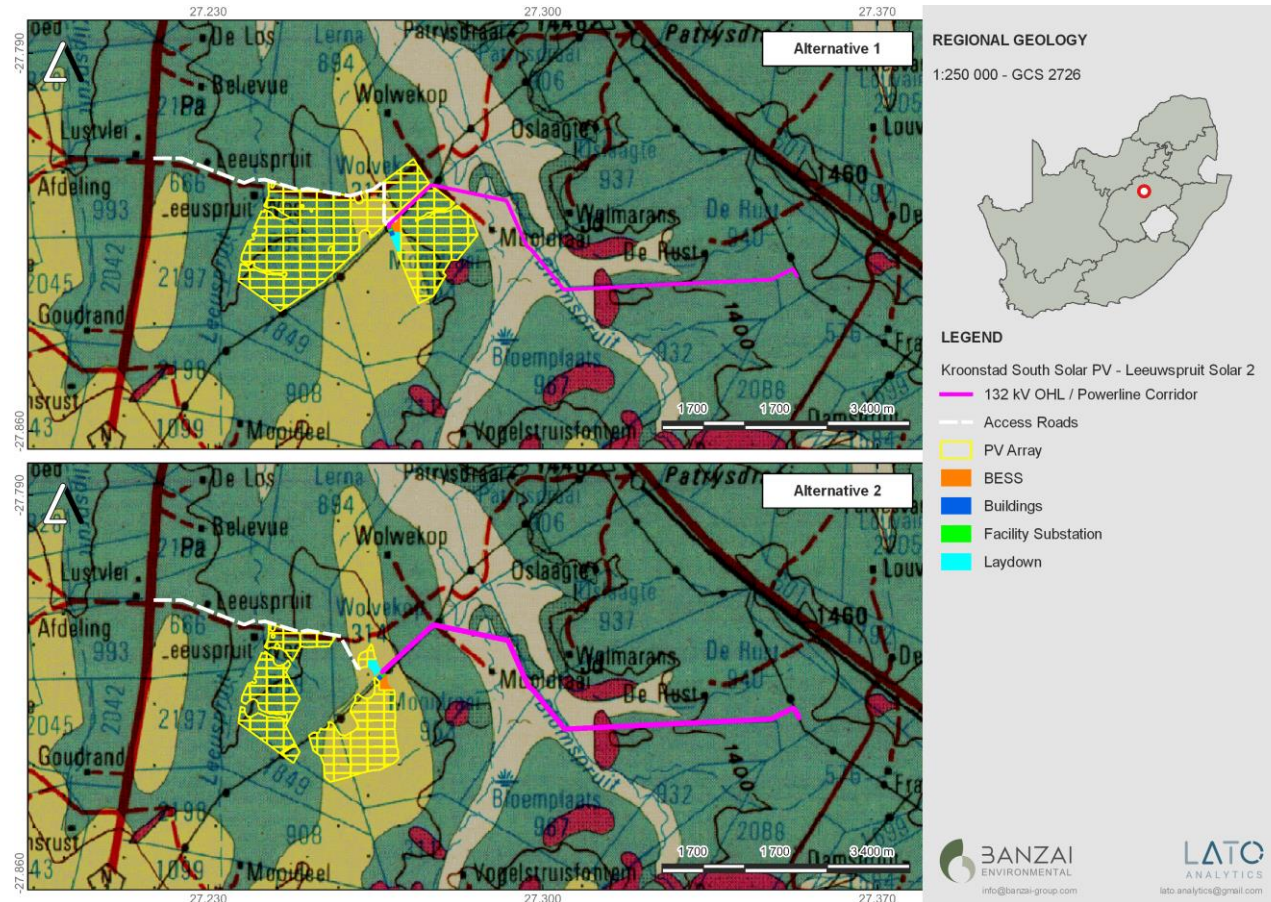
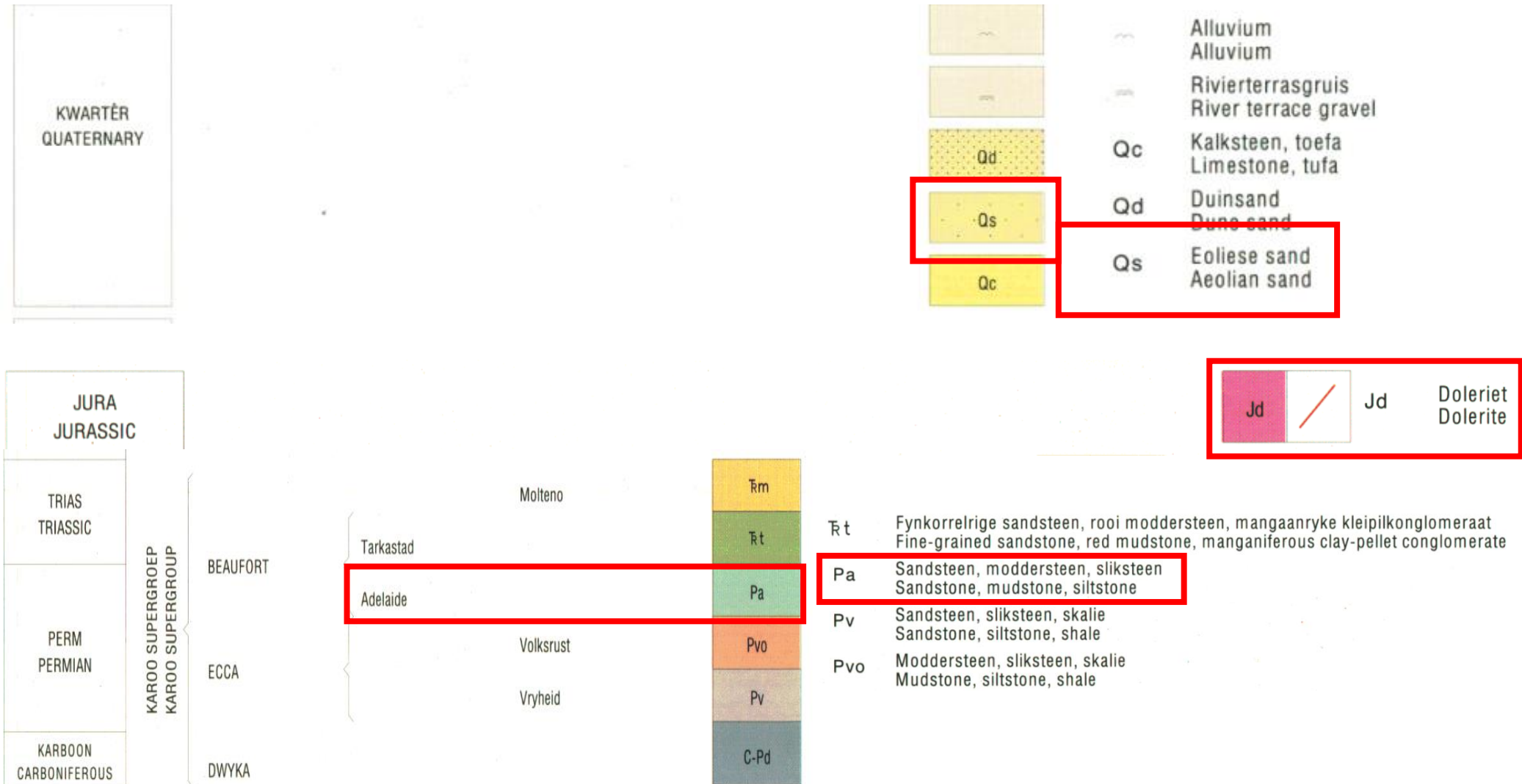


Figure 3: Extract of the 1:250 000 Koonstad 2726 (2000) Geological Map (Council for Geosciences, Pretoria) indicating the proposed Leeuwspruit Solar 2 PV development south of Koonstad in the Free State. The proposed development is underlain by Quaternary aeolian sand (Os, yellow), the Adelaide Subgroup (Pa, green) (Beaufort Group, Karoo Supergroup) as well as Jurassic dolerite (Jd, red).



Table 4: Legend to the Kroonstad 2726 (2000) Geological Map (Council for Geosciences, Pretoria).

Relevant sediments are indicated in a red square



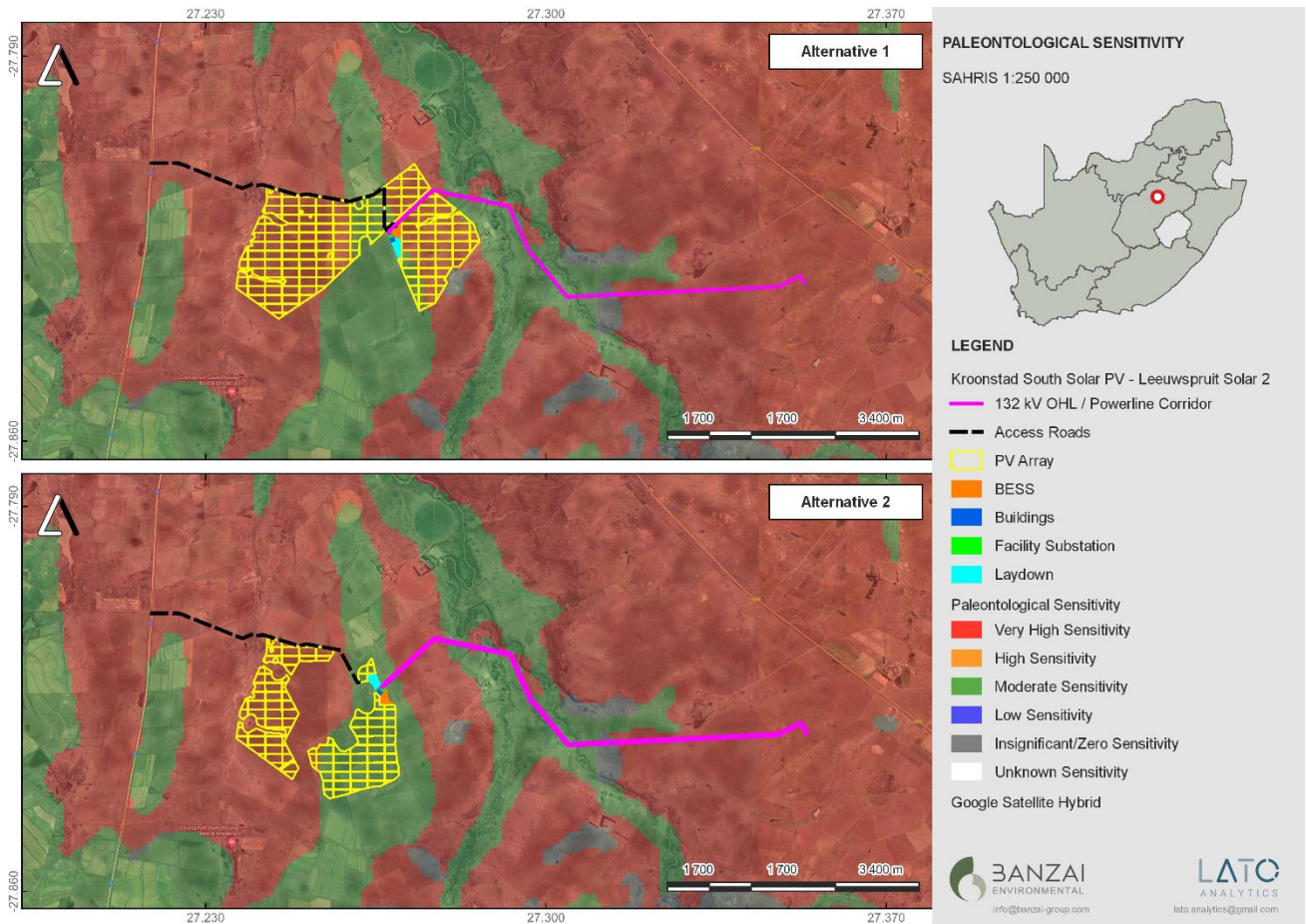


Figure 4: Extract of the 1 in 250 000 SAHRIS PalaeoMap (Council of Geosciences) indicating the proposed Leeuwspruit Solar 2 PV development near Kroonstad in the Free State.



Table 5: Palaeontological Sensitivity according to the SAHRIS PalaeoMap (Almond et al, 2013; SAHRIS website)

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

The SAHRIS Palaeosensitivity map (**Figure 4**) indicates that the proposed development is underlain by sediments with a Very High (red), Moderate (green) and Zero (grey) Palaeontological Sensitivity.

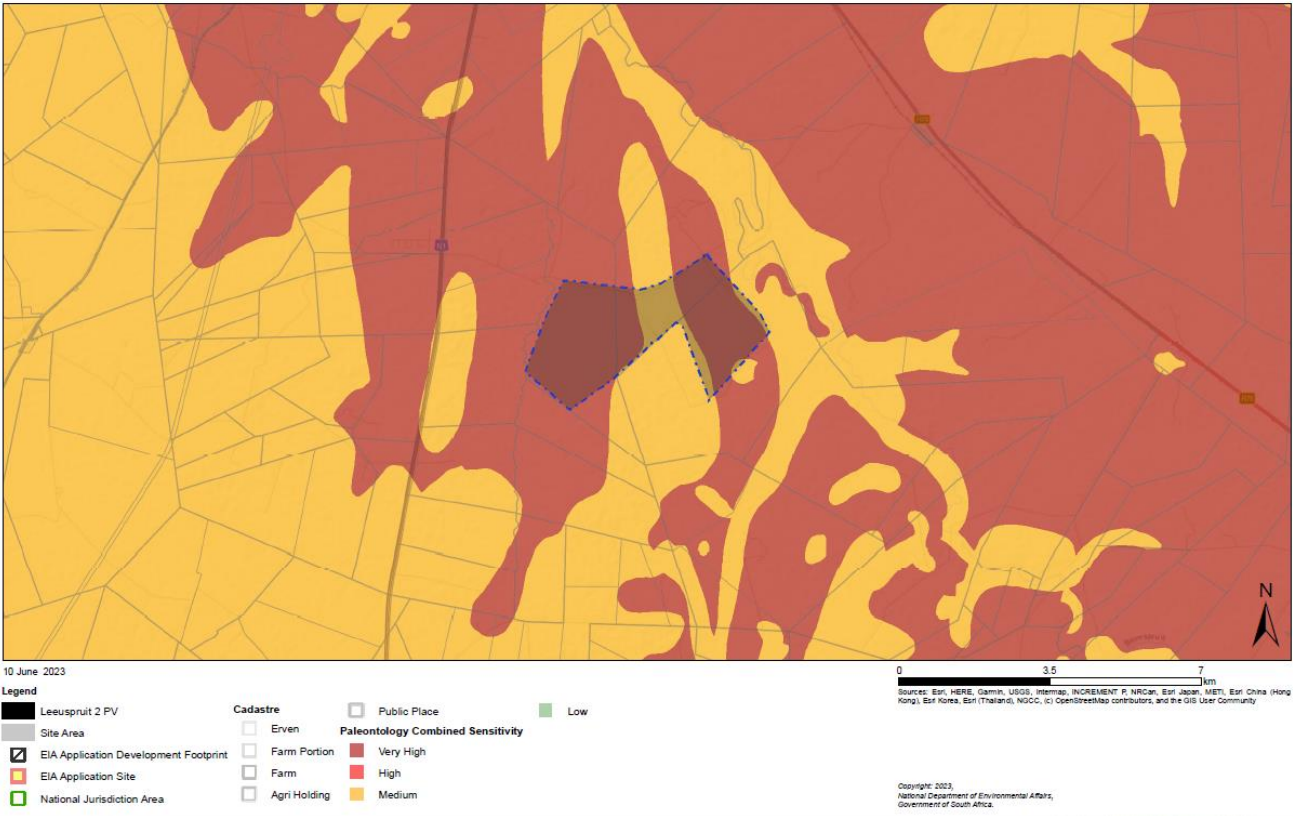


Figure 5: Palaeontological Sensitivity of the Leeuwspruit Solar PV 2 facility by the National Environmental Web-bases Screening Tool.

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

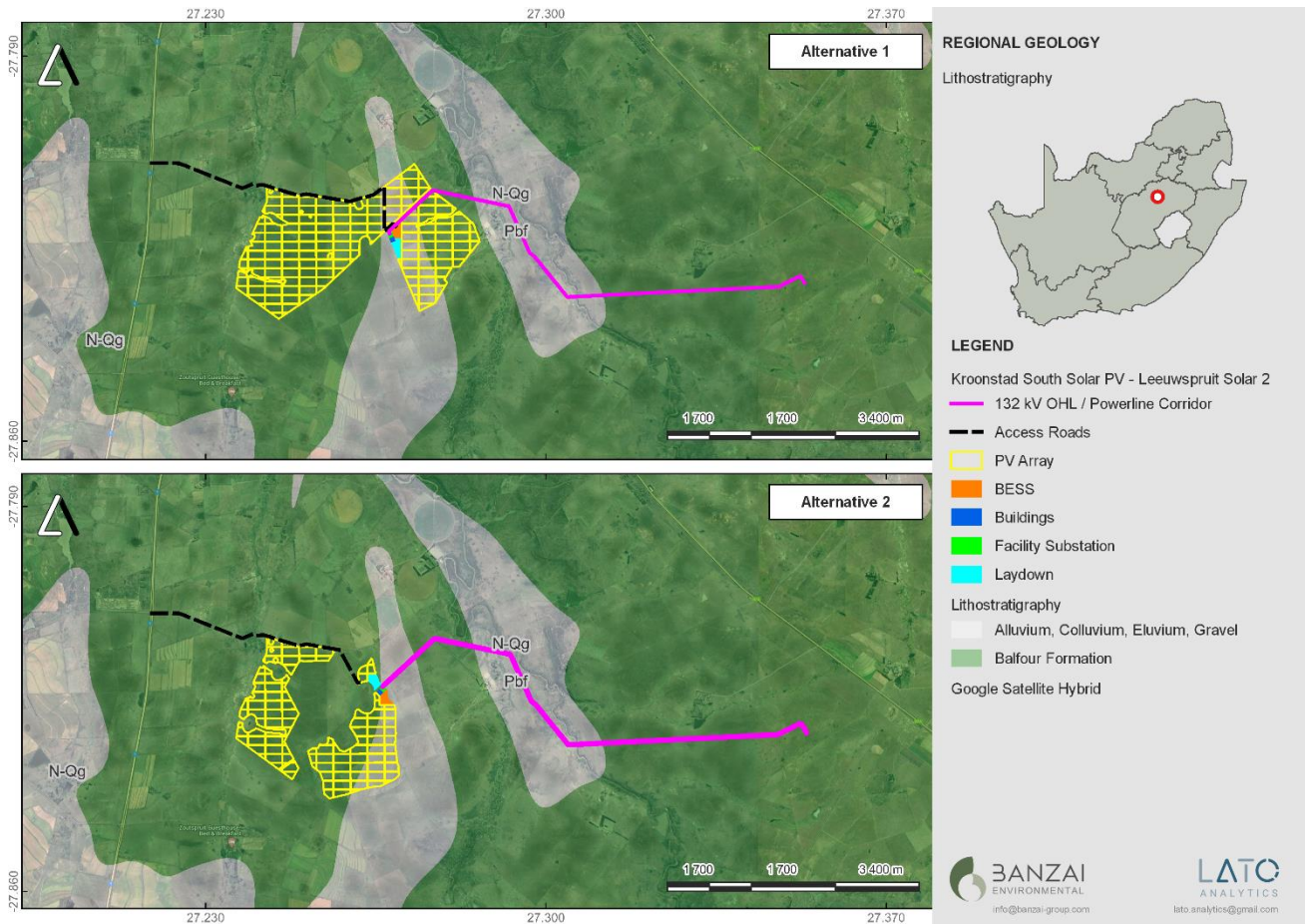


Figure 6: Updated Geology (Council of Geosciences, Pretoria) of the proposed Leeuwspruit Solar 2 PV development south of Kroonstad in the Free State indicates that the development is underlain by Alluvium, Elluvium, Colluvium and Gravel, as well as the Balfour Formation (Adelaide Subgroup, Karoo Supergroup).

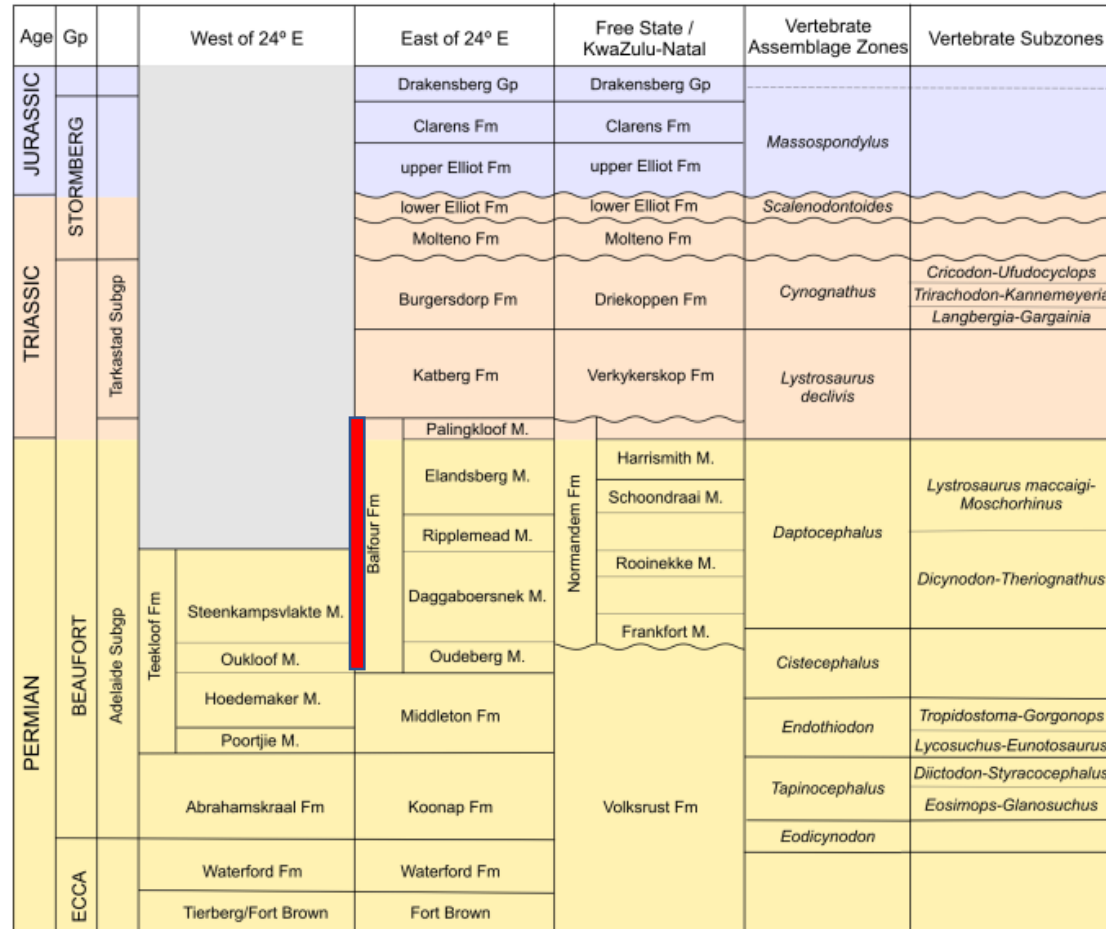


Figure 7: Vertebrate biozonation range chart for the Main Karoo Basin of South Africa. Solid lines indicate known ranges, dotted lines indicate suspected but not confirmed ranges, single dot represents the stratigraphic position of the taxa that have only been recovered from a single bed.

Wavy lines indicate unconformities. (PLYCSR=Pelycosauria and MAMMFMES+Mammaliaformes. Gp=group, Subgp-Supgroup, Fm=Formation, M=Member
The geology of the proposed development is indication by the red line.

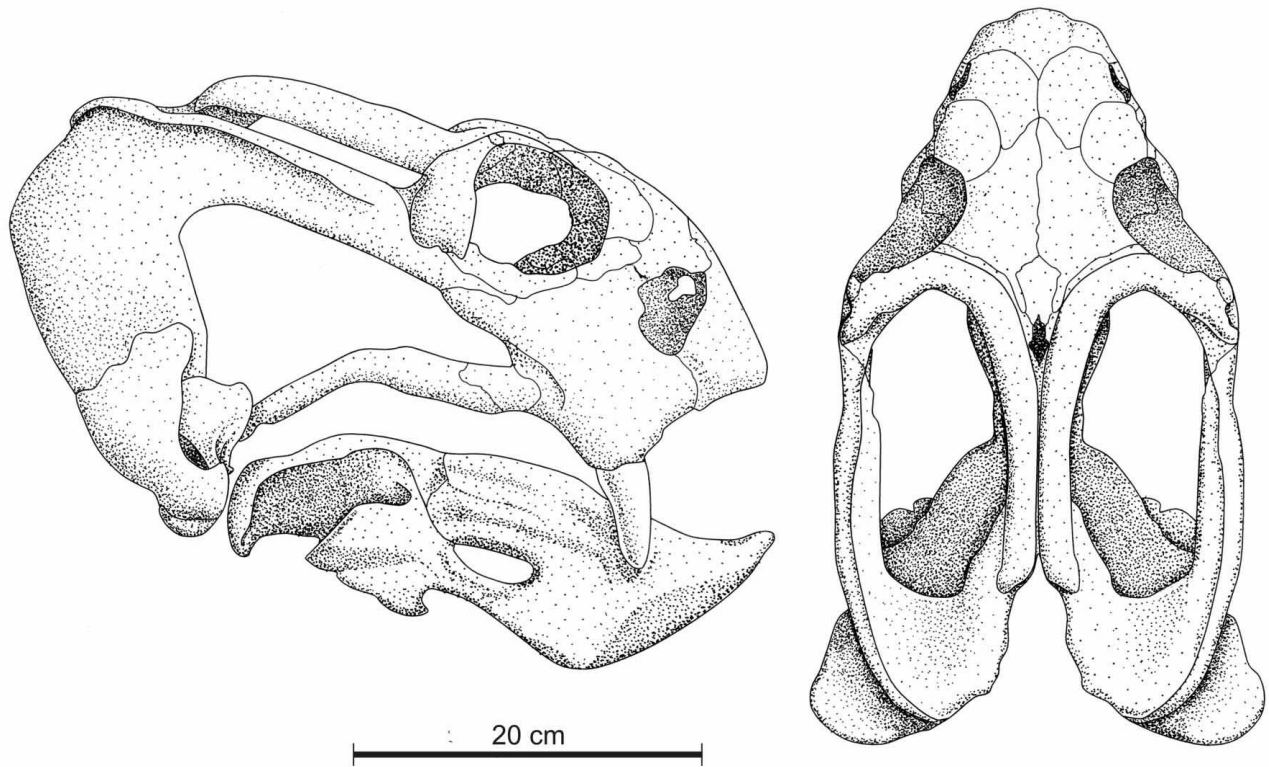


Figure 8: Lateral and dorsal views of skull of the dicynodont *Daptocephalus leoniceps*, the main biozone defining fossil (Image taken from Viglietti, 2020) and dorsal views (Image taken from Viglietti, 2020).

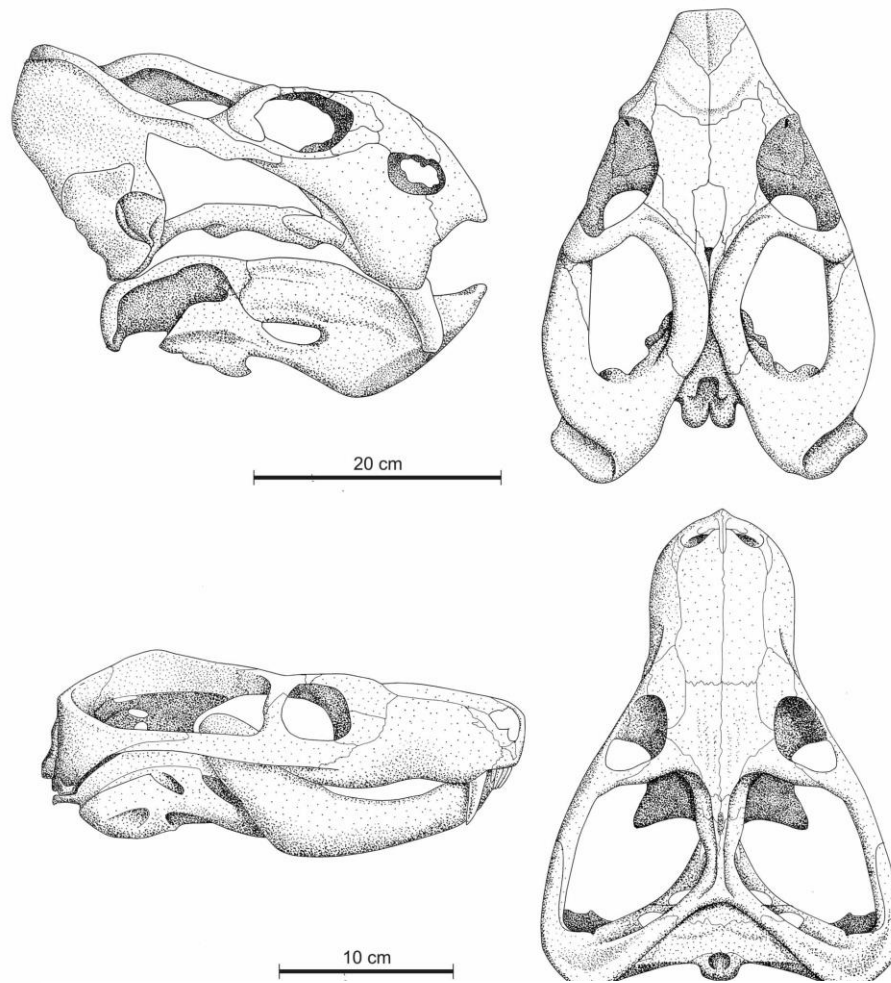


Figure 9: Skulls of the biozone defining fossils of the *Dicynodon-Theriognathus* Subzone in lateral and dorsal views. *Dicynodon lacerticeps* (top), *Theriognathus microps* (bottom) (Image taken from Viglietti, 2020).

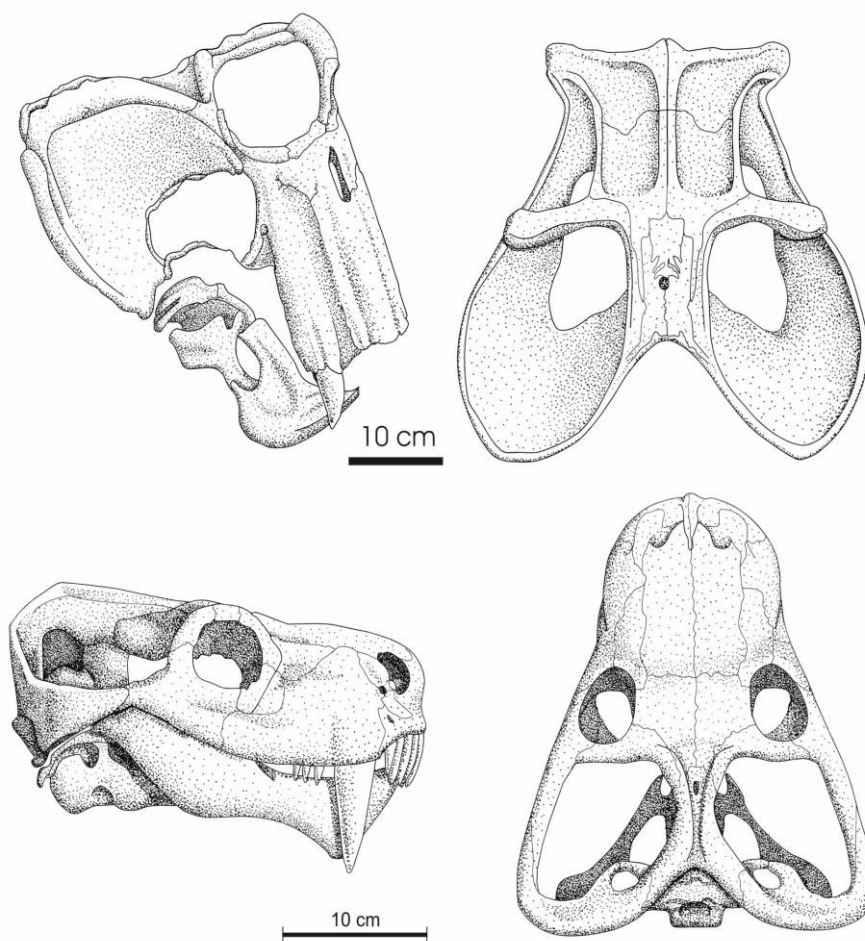


Figure 10: Biozone defining fossils of the *Lystrosaurus maccaigi*- *Moschorhinus* Subzone. The skulls of the *Lystrosaurus maccaigi* (top) and *Moschorhinus kitchinqi* (bottom) in lateral (Image taken from Viqlietti, 2020).

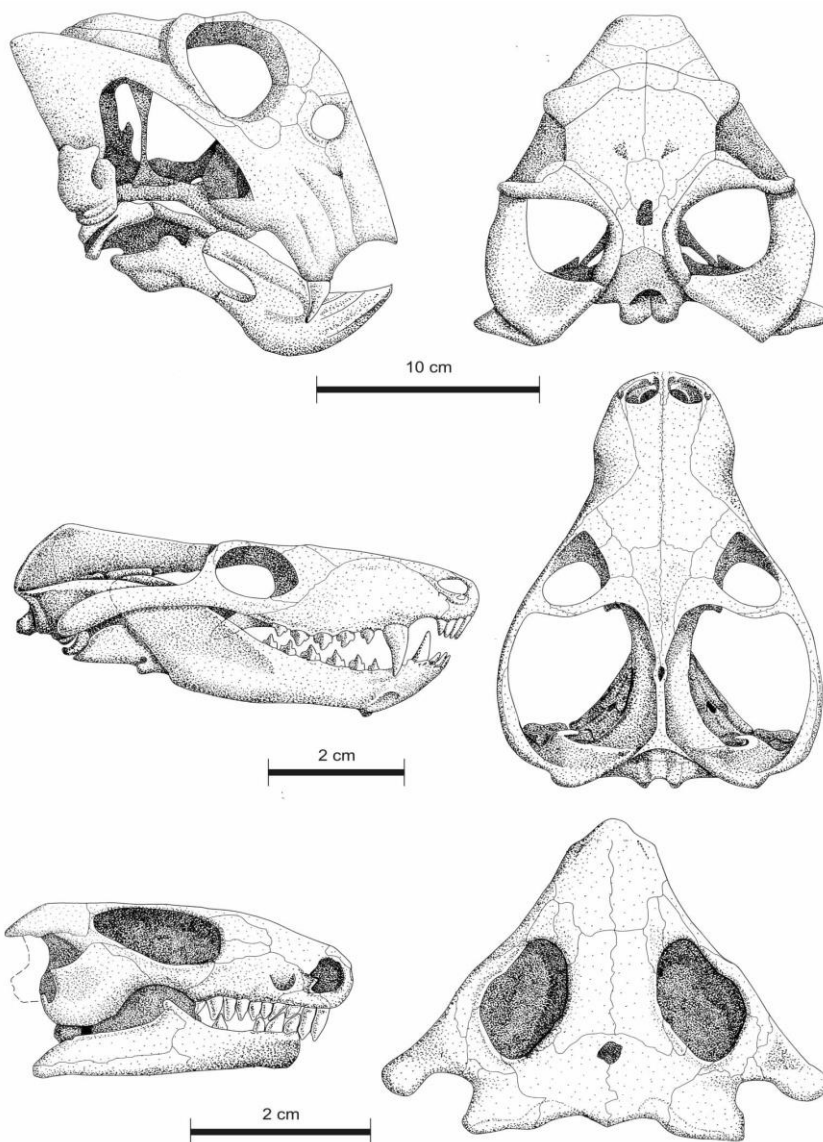


Figure 11: Lateral and dorsal views of the index taxa defining the *Lystrosaurus declivis* Assemblage Zone. (top) *Lystrosaurus declivis*, (centre) *Thrinaxodon liorhinus*, (bottom) *Procolophon trigoniceps* (Image taken from Botha and Smith, 2020). Image taken from Viglietti, 2020.

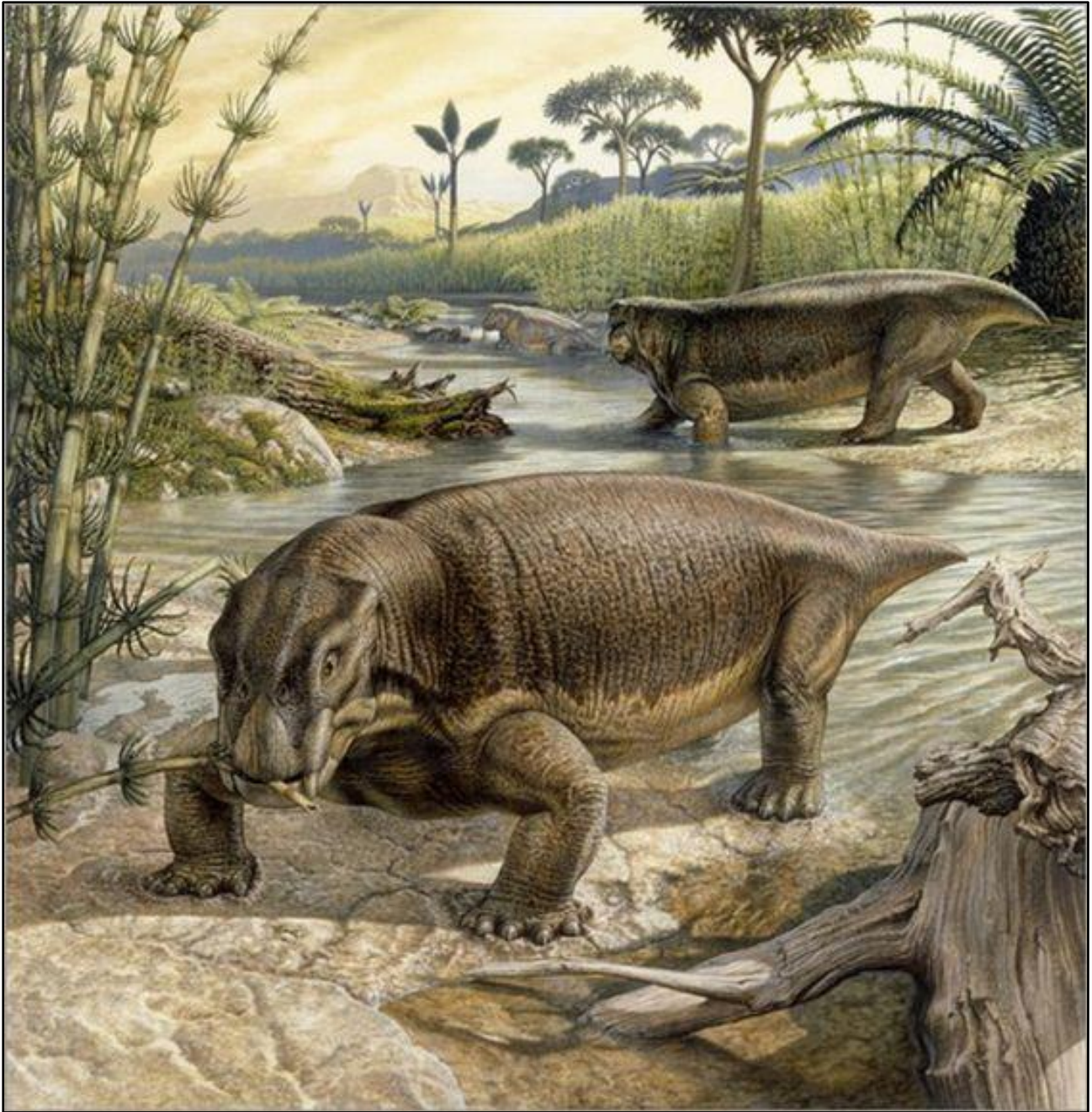


Figure 12: Reconstruction of *Lystrosaurus* sp.

<https://i.pinimg.com/564x/ac/7b/13/ac7b132d1d9882e6d9f9af804820a21e.jpg>

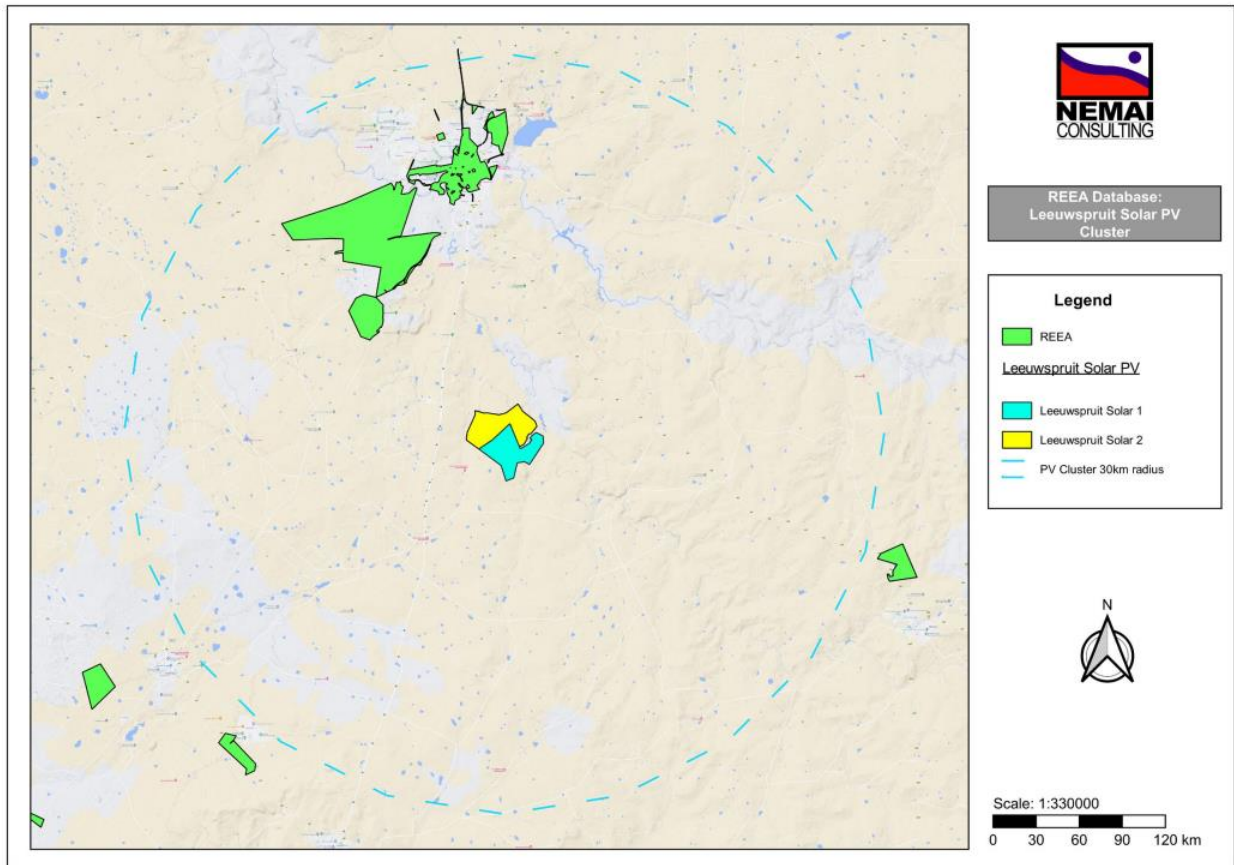


Figure 13: Renewable energy applications in relation to the Project (within a 30km radius)

Solar facilities have been identified in a 30 km radius of the proposed development. However, it is important to note that the quality of preservation of different sites will most probably vary and it is thus difficult to allocate a Cumulative Sensitivity to projects. If all the mitigation measures are carried out, a conservative estimate of the Cumulative impacts on fossil Heritage will vary between Low and Medium.



6. GEOGRAPHICAL LOCATION OF THE SITE

The Project is located approximately 18km to the south of Kroonstad central business district (CBD) and falls within Ward 1 of the Moqhaka Local Municipality, in the Free State Province. The site is accessed from the N1 (Figure 1-2).

7. ADDITIONAL INFORMATION CONSULTED

In compiling this report the following sources were consulted:

- Geological map 1:100 000, Geology of the Republic of South Africa (Visser 1984)
- A Google Earth map with polygons of the proposed development was obtained from SiVEST.
- 1:250 000 2726 Kroonstad (2000) Geological Map (Council for Geosciences, Pretoria)
- Updated geological shape files (Council for Geosciences, Pretoria)
- National Environmental Web-based Screening Tool

8. SITE VISIT

A site-specific field survey of the development footprint was conducted on foot and by motor vehicle on 13 May 2023. No fossiliferous outcrops were identified during the site visit. This could be attributed to the lack of outcrops in the proposed development as well as lush vegetation.



Figure 14: General view of the proposed development indicates a low topography with grassveld vegetation.



9. ASSESSMENT METHODOLOGT

9.1 Method of Environmental Assessment

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 following project phases:

- Construction.
- Operation; and
- Decommissioning.

Where necessary, the proposal for mitigation or optimisation of an impact should be detailed. A brief discussion of the impact and the rationale behind the assessment of its significance 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 6: The rating system

NATURE		
The Nature of the Impact is the possible destruction of fossil heritage		
GEOGRAPHICAL EXTENT		
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.
PROBABILITY		
This describes the chance of occurrence of an impact.		
1	Unlikely	The chance of the impact occurring is extremely low (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).
DURATION		
This describes the duration of the impacts. Duration indicates the lifetime of the impact as a result of the 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 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.
INTENSITY/ MAGNITUDE		
Describes the severity of an impact.		
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	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 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.

REVERSIBILITY

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

IRREPLACEABLE LOSS OF RESOURCES

This describes the degree to which resources 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.

CUMULATIVE EFFECT



This describes the cumulative effect of the impacts. A cumulative impact is an effect which in itself may not be significant but may become significant if added to other existing or potential impacts 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

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 = X.

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

Table 7: Summary of Impacts

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Nature of Impacts	Loss of Fossil Heritage in or above ground surface							
Impacts	Extent	Probability	Duration	Magnitude	Reversibility	Irreplaceable loss	Cumulative effect	Impact Significance
Pre-mitigation	Site (1)	Possible (2)	Permanent (4)	High (3)	Irreversible 4	Significant loss of resources 3	Low (2)	Negative Medium (48)
Post mitigation	Site (1)	Possible (2)	Permanent (4)	Low (1)	Irreversible (4)	Significant loss of resources (3)	Low (2)	Negative Low (16)

10. CONCLUSION

The study area is underlain by Quaternary aeolian sand, the Adelaide Subgroup (Pa, green) (Beaufort Group, Karoo Supergroup) as well as Jurassic Dolerite. The PalaeoMap of the South African Heritage Resources Information System (SAHRIS) indicates that the Palaeontological Sensitivity of Quaternary sands is Moderate, the Adelaide Subgroup has a Very High Palaeontological Sensitivity while the Jurassic Dolerite is igneous in origin and has a Zero Palaeontological Sensitivity (Almond and Pether, 2009; Almond *et al.*, 2013). The potential



fossiliferous sedimentary bedrocks of the Adelaide Subgroup could have been thermally metamorphized by overlying dolerite sills compromising their palaeontological sensitivity. The Palaeontological Sensitivity generated by the National Environmental Web-Based Screening indicates that the Sensitivity of the proposed development is Very High. Updated Geology (Council of Geosciences) refines the geology and indicates that the proposed development is underlain by the alluvium, colluvium, eluvium and gravel as well as the Balfour Formation of the Adelaide Subgroup (Beaufort Group) (Groenewald *et al.*, 2014). Two Layout alternatives have been proposed for the project. Layout Alternative One is the original layout and Alternative Two has been revised after specialist input. As the geology of the two layouts are the same there are no preference between the alternatives from a Palaeontological Perspective.

A site-specific field survey of the development footprint was conducted on foot and by motor vehicle on 13 May 2023. No fossiliferous outcrop was detected in the proposed development. This could be attributed to the lack of outcrops as well as the lush grassy vegetation in the area. Based on the site investigation as well as desktop research it is concluded that fossil heritage of scientific and conservational interest in the development footprint is rare. This is in contrast with the High Sensitivity allocated to the development area by the SAHRIS Palaeosensitivity Map and DFFE Screening Tool. **A medium Palaeontological Significance has been allocated for the construction phase of the PV development pre-mitigation and a low significance post mitigation.** The construction phase will be the only development phase impacting Palaeontological Heritage and **no significant impacts are expected to impact the Operational and Decommissioning phases.** As the No-Go Alternative considers the option of 'do nothing' and maintaining the status quo, it will have a Neutral impact on the Palaeontological Heritage of the development. **The Cumulative impacts of the development near Kroonstad is considered to be Low and falls within the acceptable limits for the project.** It is therefore considered that the proposed development will not lead to damaging impacts on the palaeontological resources of the area. **The construction of the development may thus be permitted in its whole extent, as the development footprint is not considered sensitive in terms of palaeontological resources.** It is consequently recommended that no further palaeontological heritage studies, ground truthing and/or specialist mitigation are required pending the discovery of newly discovered fossils.

If fossil remains are discovered during any phase of construction, either on the surface or exposed by excavations the **Chance Find Protocol** must be implemented by the ECO/site manager in charge of these developments. These discoveries ought to be protected (if possible, *in situ*) and the ECO/site manager must report to 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 carry out by a paleontologist.

Preceding any collection of fossil material, the specialist would need to apply for a collection permit from SAHRA. Fossil material must be curated in an accredited collection (museum or university collection), while all fieldwork and reports should meet the minimum standards for palaeontological impact studies suggested by SAHRA.



11. CHANCE FINDS PROTOCOL

The following procedure will only be followed if fossils are uncovered during the excavation phase of the development.

Legislation

Cultural Heritage in South Africa (includes all heritage resources) is protected by the **National Heritage Resources Act (Act No 25 of 1999) (NHRA)**. According to Section 3 of the Act, all Heritage resources include “all objects recovered from the soil or waters of South Africa, including archaeological and palaeontological objects and material, meteorites and rare geological specimens”.

Palaeontological heritage is unique and non-renewable and is protected by the NHRA and are the property of the State. It is thus the responsibility of the State to manage and conserve fossils on behalf of the citizens of South Africa. Palaeontological resources may not be excavated, 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.

A fossil is the naturally preserved remains (or traces thereof) of plants or animals embedded in rock. These organisms lived millions of years ago. Fossils are extremely rare and irreplaceable. By studying fossils, it is possible to determine the environmental conditions that existed in a specific geographical area millions of years ago.

This informational document is intended for workmen and foremen on construction sites. It describes the actions to be taken when mining or construction activities accidentally uncovers fossil material.

It is the responsibility of the Environmental Site Officer (ESO) or site manager of the project to train the workmen and foremen in the procedure to follow when a fossil is accidentally uncovered. In the absence of the ESO, a member of the staff must be appointed to be responsible for the proper implementation of the chance find protocol as not to compromise the conservation of fossil material.

Chance Find Procedure

- If a chance find is made the person responsible for the find must immediately **stop working** and all work that could impact that finding must cease in the immediate vicinity of the find.
- The person who made the find must immediately **report** the find to his/her direct supervisor which in turn must report the find to his/her manager and the ESO or site manager. The ESO or site manager must report the find to the relevant Heritage Agency (South African Heritage Research 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. The information to the Heritage Agency must include photographs of the find, from various angles, as well as the GPS co-ordinates.
- A preliminary report must be submitted to the Heritage Agency within **24 hours** of the find and must include the following: 1) date of the find; 2) a description of the discovery and a 3) description of the fossil and its context (depth and position of the fossil), GPS co-ordinates.
- Photographs (the more the better) of the discovery must be of high quality, in focus, accompanied by a scale. It is also important to have photographs of the vertical section (side) where the fossil was found.
- Upon receipt of the preliminary report, the Heritage Agency will inform the ESO (or site manager) whether a rescue excavation or rescue collection by a palaeontologist is necessary.
- The site must be secured to protect it from any further damage. **No attempt** should be made to remove material from their environment. The exposed finds must be stabilized and covered by a plastic sheet or sand bags. The Heritage agency will also be able to advise on the most suitable method of protection of the find.
- If the fossil cannot be stabilized the fossil may be collected with extreme care by the ESO. Fossils finds must be stored in tissue paper and in an appropriate box while due care must be taken to remove all fossil material from the rescue site.
- Once the Heritage Agency has issued the written authorization, the developer may continue with the development on the affected area.



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APPENDIX A

CURRICULUM VITAE

ELIZE BUTLER

PROFESSION: Palaeontologist

YEARS' EXPERIENCE: 30 years in Palaeontology

EDUCATION: B.Sc Botany and Zoology, 1988
University of the Orange Free State
B. Sc (Hons) Zoology, 1991
University of the Orange Free State
Management Course, 1991
University of the Orange Free State
M. Sc. *Cum laude* (Zoology), 2009
University of the Free State

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

MEMBERSHIP

Palaeontological Society of South Africa (PSSA) 2006-currently

EMPLOYMENT HISTORY

Part-time Laboratory assistant	Department of Zoology & Entomology University of the Free State Zoology 1989-1992
Part-time laboratory assistant	Department of Virology University of the Free State Zoology 1992
Research Assistant	National Museum, Bloemfontein 1993 – 1997
Principal Research Assistant and Collection Manager	National Museum, Bloemfontein 1998–2022



TECHNICAL REPORTS

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Butler. E., 2022. Palaeontological Desktop Assessment for the proposed Leeuwbosch PV solar photovoltaic (PV) plant and associated infrastructure on Portion 37 of the Farm Leeuwbosch No. 44 near Leeudoringstad within the Maquassi Hills Local Municipality in the Dr Kenneth Kaunda District Municipality in the North West Province.



APPENDIX B

PALAEONTOLOGICAL SITE VERIFICATION REPORT

Leeuwspruit Solar 2 PV Project

(Part of the Leeuwspruit Solar PV Cluster)

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1. INTRODUCTION

Nemai Consulting CC (Nemai) was appointed by Leeuwspruit Solar 2 (Pty) Ltd (the “Applicant”) to conduct the Environmental Impact Assessment (EIA) for the proposed 300 MW Solar Photovoltaic (PV) Project south of Kroonstad, in the Free State Province (the “Project”) (**Figure S1-S2, Table S1**).

The electricity generated by the Project will be transferred via 132kV powerlines from the facility substation to a new 132/400 kV Main Transmission Substation (MTS). The Applicant intends to bid for the current and future Renewable Energy Independent Power Producer Procurement Programme (REIPPPP) bid windows and/or other renewable energy markets within SA.



Table S1: Property details

Farm Name	21-digit Surveyor General (SG) Code
PV Site	
MOOIDRAAI 953 PORTION 0	F02000000000095300000
LEEUWSPRUIT 659 PORTION 0	F02000000000065900000
WOLVEKOP 314 PORTION 0	F02000000000031400000
Access Road	
LEEUWSPRUIT WEST 666 PORTION 1	F02000000000066600001
LEEUWSPRUIT WEST 666 REM EXTENT	F02000000000066600000
Power Line Route	
MOOIDRAAI 953 PORTION 0	F02000000000095300000
OSLAAGTE 2564 PORTION 0	F020000000000256400000

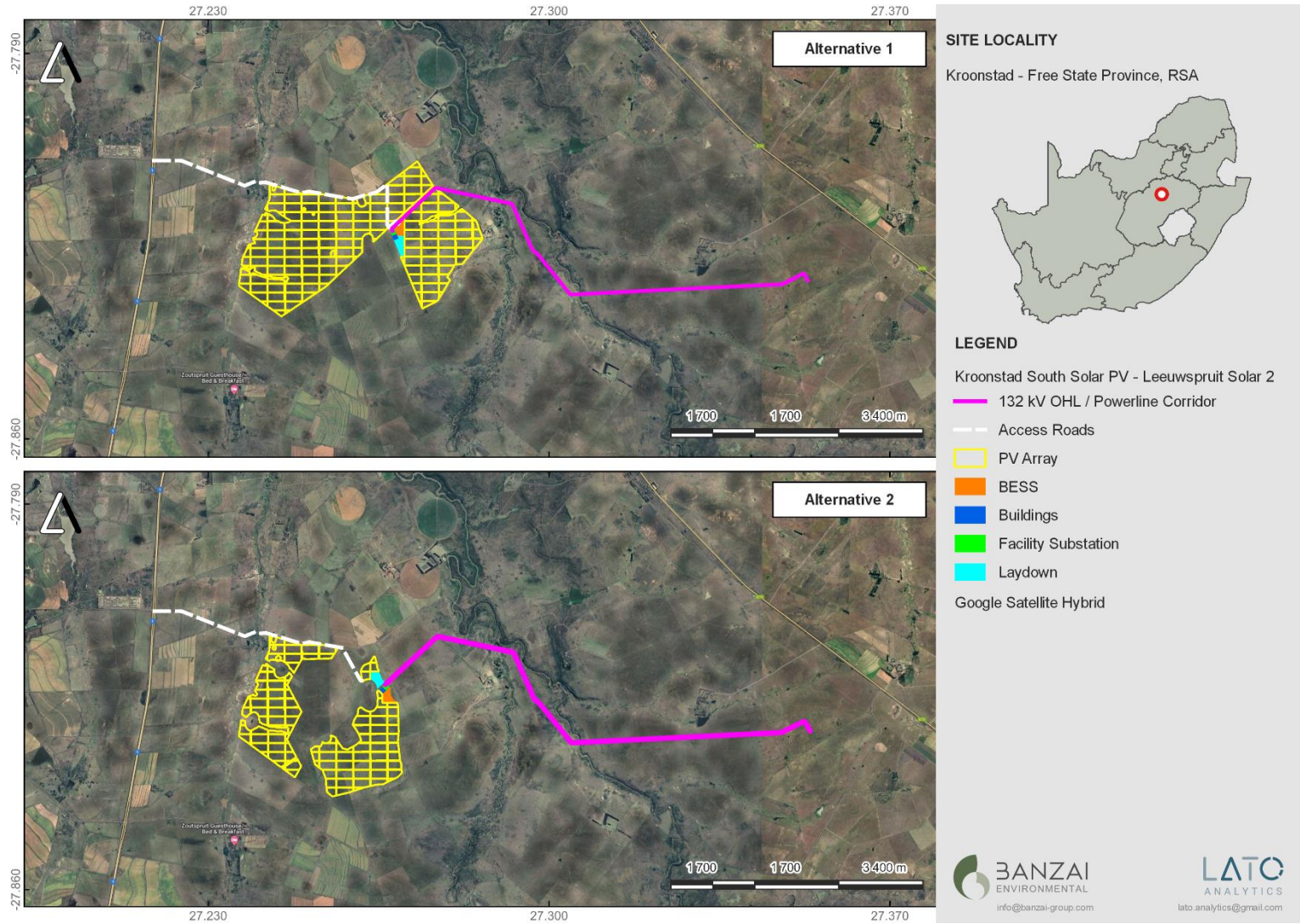


Figure S1: Regional locality Map of the proposed Leeuwspruit Solar 2 PV Facility south of Kroonstad in the Free State Province.

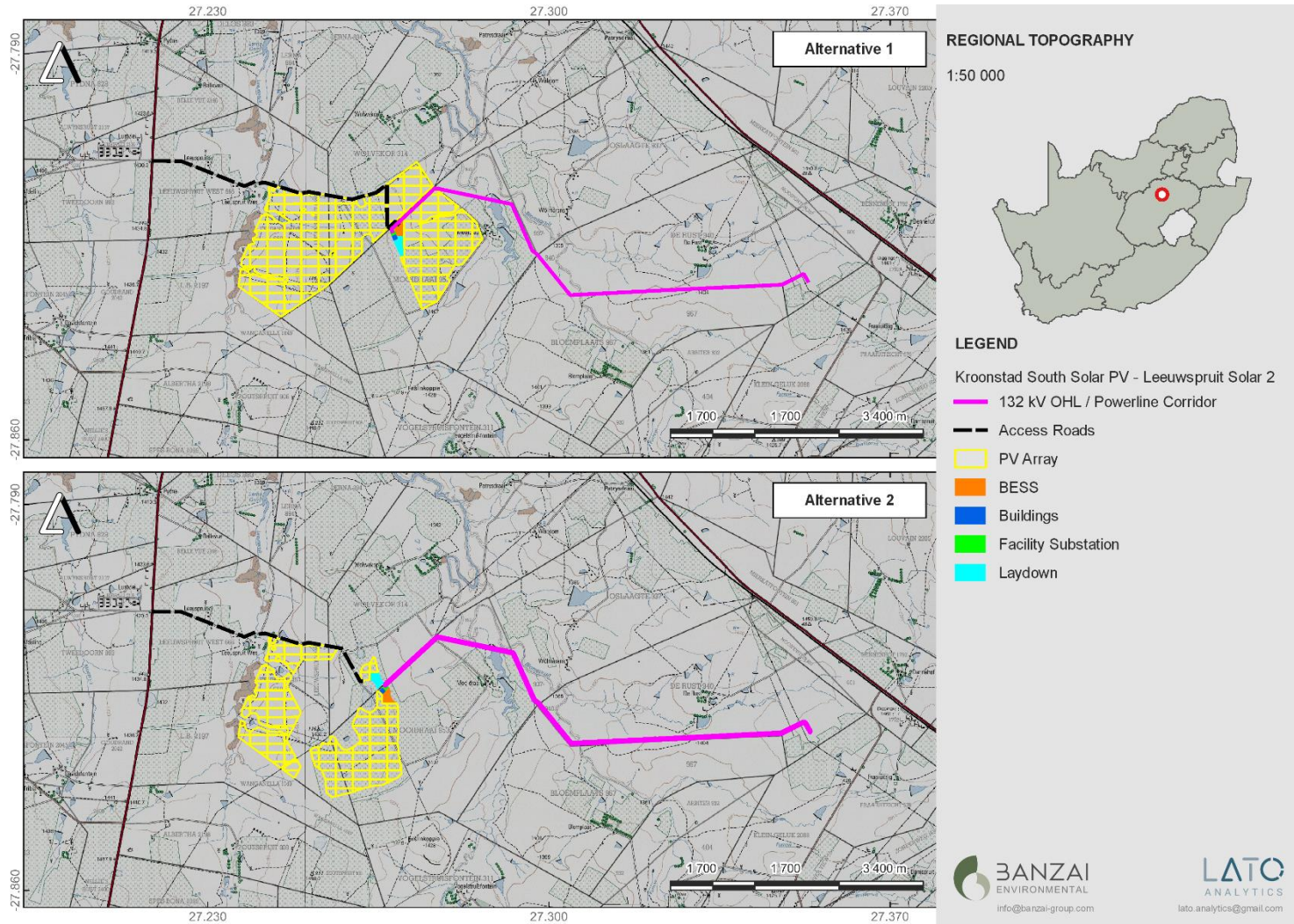


Figure S2: Locality map of the proposed Leeuwspruit Solar 2 PV Facility near Kroonstad in the Free State Province.



2. TECHNICAL DETAILS FOR THE PROPOSED DEVELOPMENT

The Project consists of the following systems, sub-systems or components (amongst others):

- PV modules and mounting structures which will consist of either Monofacial or Bifacial PV panels, mounted on either fixed-tilt, single-axis tracking, and/or double-axis tracking systems.
- Inverters and transformers.
- Battery Energy Storage System (BESS) area up to 5ha.
- Operation and Maintenance buildings including a gate house and security building, control centre, offices, warehouses and workshops for storage and maintenance.
- Facility grid connection infrastructure, including:
 - 33kV cabling between the project components and the facility substation
 - A 132kV facility substation
 - 33kV or 132kV cabling or powerline between the facility substation and the proposed Main Transmission Substation.
- Temporary construction laydown area up to 7 ha.
- Permanent laydown area up to 1 ha (to be located within the area demarcated for the temporary construction laydown).
- Internal roads will be up to 6 m wide, to allow access to the Solar PV modules for operations and maintenance activities.
- Main access road is up to 8 m wide. The site is accessible via the N1.

In terms of the National Environmental Management Act (Act 107 of 1998, as amended) (NEMA) Environmental Impact Assessment (EIA) Regulations [4 December 2014, Government Notice (GN) R982, R983, R984 and R985, as amended), various aspects of the proposed development may have an impact on the environment and are considered to be listed activities. These activities require environmental authorisation (EA) from the Competent Authority (CA), namely the DFFE, prior to the commencement thereof.

In accordance with GN 320 of 20 March 2020 and GN 1150 of 30 October 2020¹ (i.e., “the Protocols”) of the NEMA EIA Regulations of 2014 (as amended), prior to commencing with a specialist assessment, a site sensitivity verification must be undertaken to confirm the current land use and environmental sensitivity of the proposed project area as identified by the National Web-Based Environmental Screening

¹ GN 320 (20 March 2020): Procedures for The Assessment and Minimum Criteria for Reporting on Identified Environmental Themes in terms of Sections 24(5)(A) and (H) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation
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Reg No. 2015/332235/07 |



Tool (i.e., Screening Tool). Elize Butler as Palaeontology Specialist have been commissioned to verify the sensitivity of the Leeuwspruit Solar PV Cluster and associated infrastructure site under these specialist protocols.

3. SITE SENSITIVITY VERIFICATION METHODOLOGY

The Palaeontology Sensitivity Verification was undertaken by the following methodology:

- The site sensitivity is established through the National Environmental Web-Based Screening Tool
- The Site is mapped on the relevant Geological Map to determine the underlying geology of the development
- Then the site is mapped on the South African Heritage Resources Information System (SAHRIS) PalaeoMap, and the Sensitivity of the proposed development established.
- Other information is obtained by using satellite imagery and
- Palaeontological Impact Assessments and Desktop Assessments of projects in the same area are studied.
- A comprehensive site-specific field survey of the development footprint for the combined projects was conducted on foot and motor vehicle by Banzai Environmental in May 2023.

4. OUTCOME OF SITE SENSITIVITY VERIFICATION

The geology of the proposed Leeuwspruit Solar 2 PV near Kroonstad in the Free State is depicted on the 1: 250 000 Kroonstad 2726 (2000) Geological Map (Council for Geosciences, Pretoria) (**Figure S3, Table S2**). This map indicates that the study area is underlain by Quaternary aeolian sand (Qs, yellow), the Adelaide Subgroup (Pa, green) (Beaufort Group, Karoo Supergroup) as well as Jurassic Dolerite (Karoo Igneous Province; Jd, red).

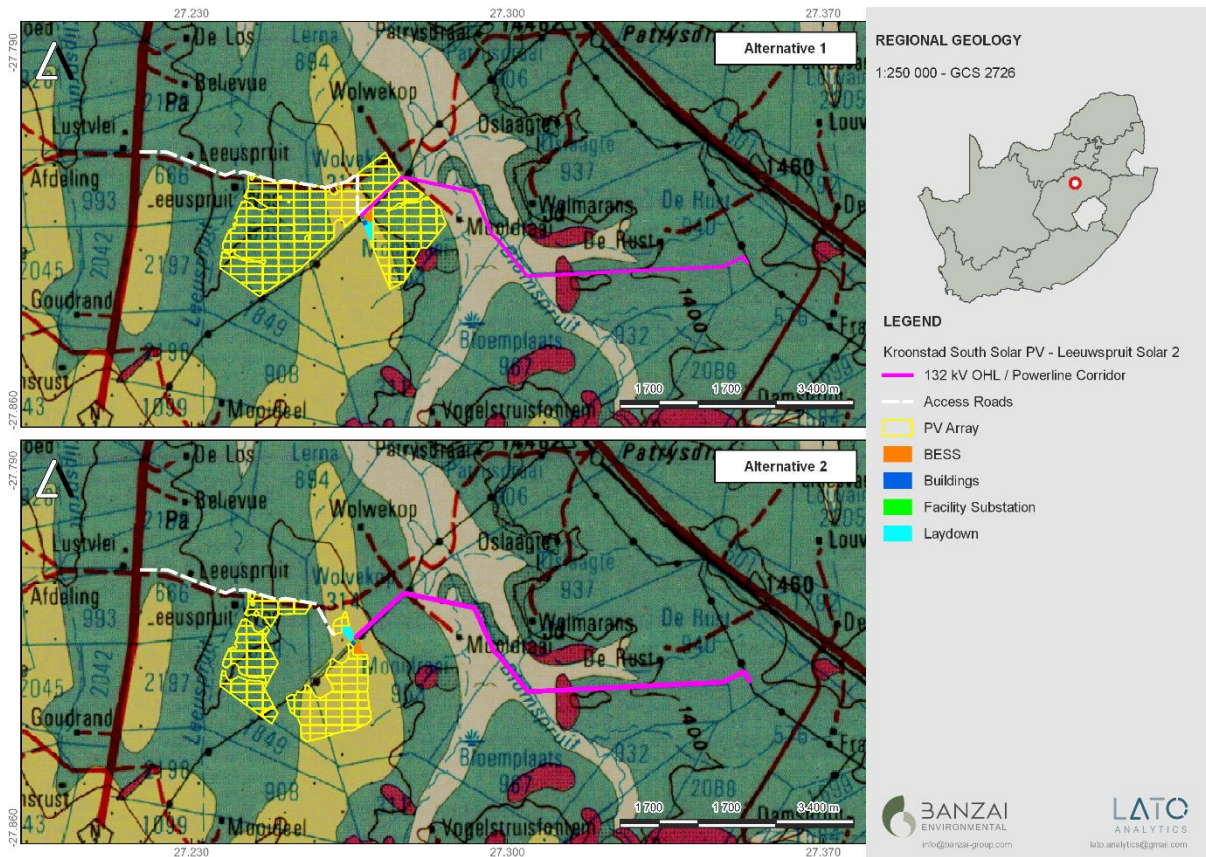
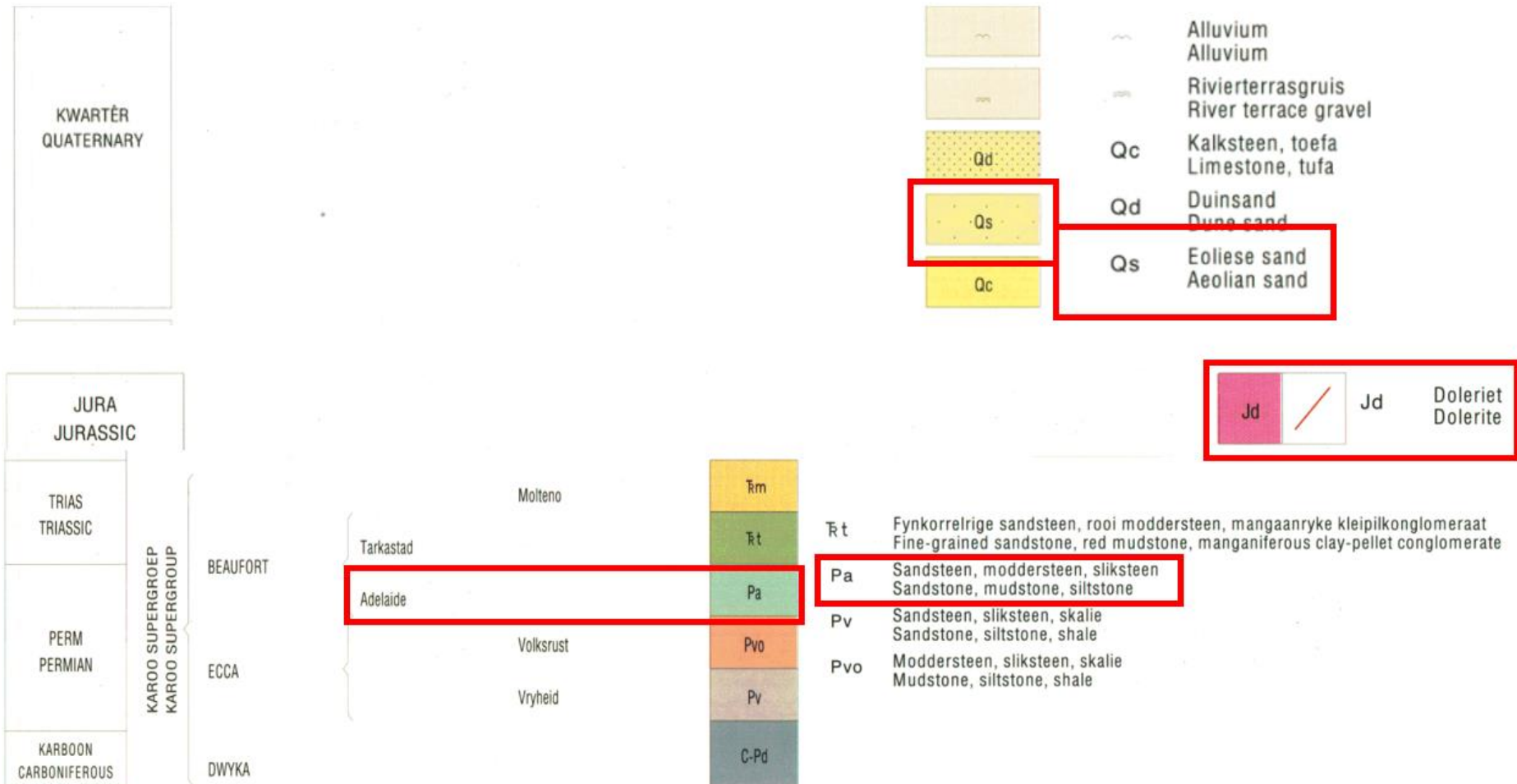


Figure S3: Extract of the 1: 250 000 Kroonstad 2726 (2000) Geological Map (Council of Geoscience, Pretoria) indicating that the study area is underlain by Quaternary aeolian sand (Os, yellow), the Adelaide Subgroup (Pa, green) (Beaufort Group, Karoo Supergroup) as well as Jurassic dolerite (Jd, red).



Table S2: Legend to the Kroonstad 2726 (2000) Geological Map (Council for Geosciences, Pretoria).

Relevant sediments are indicated in a red square



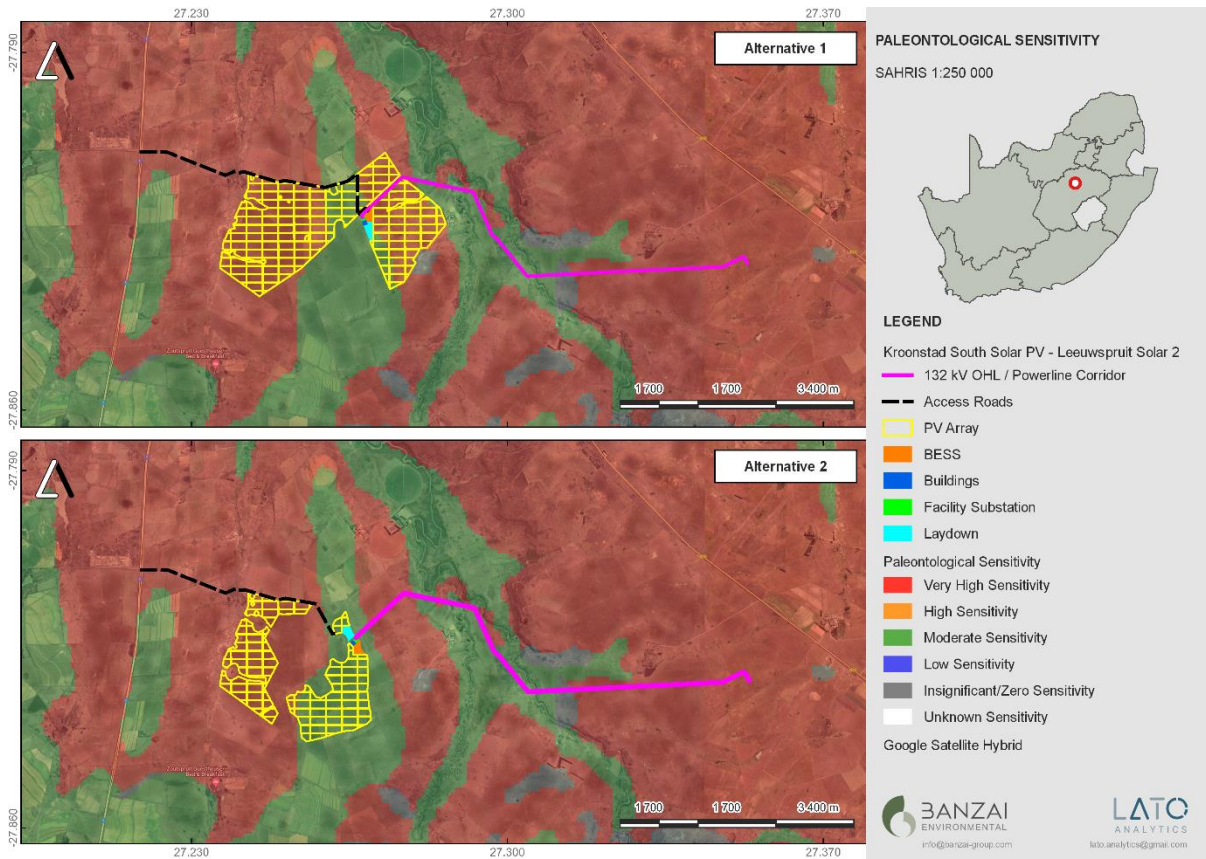


Figure S4: Extract of the 1: 250 000 SAHRIS PalaeoMap map (Council of Geosciences) indicating the proposed Leeuwspruit 2 PV development and associated infrastructure.



Table S3: Palaeontological Sensitivity according to the SAHRIS PalaeoMap (Almond et al, 2013; SAHRIS website).

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

The PalaeoMap of the South African Heritage Resources Information System (Figure S4, Table S3) indicates that the Palaeontological Sensitivity of the Leeuwspruit Solar 2 PV development is Very High (red), Moderate (green) and Zero (grey) (Almond and Pether, 2009; Almond et al., 2013).

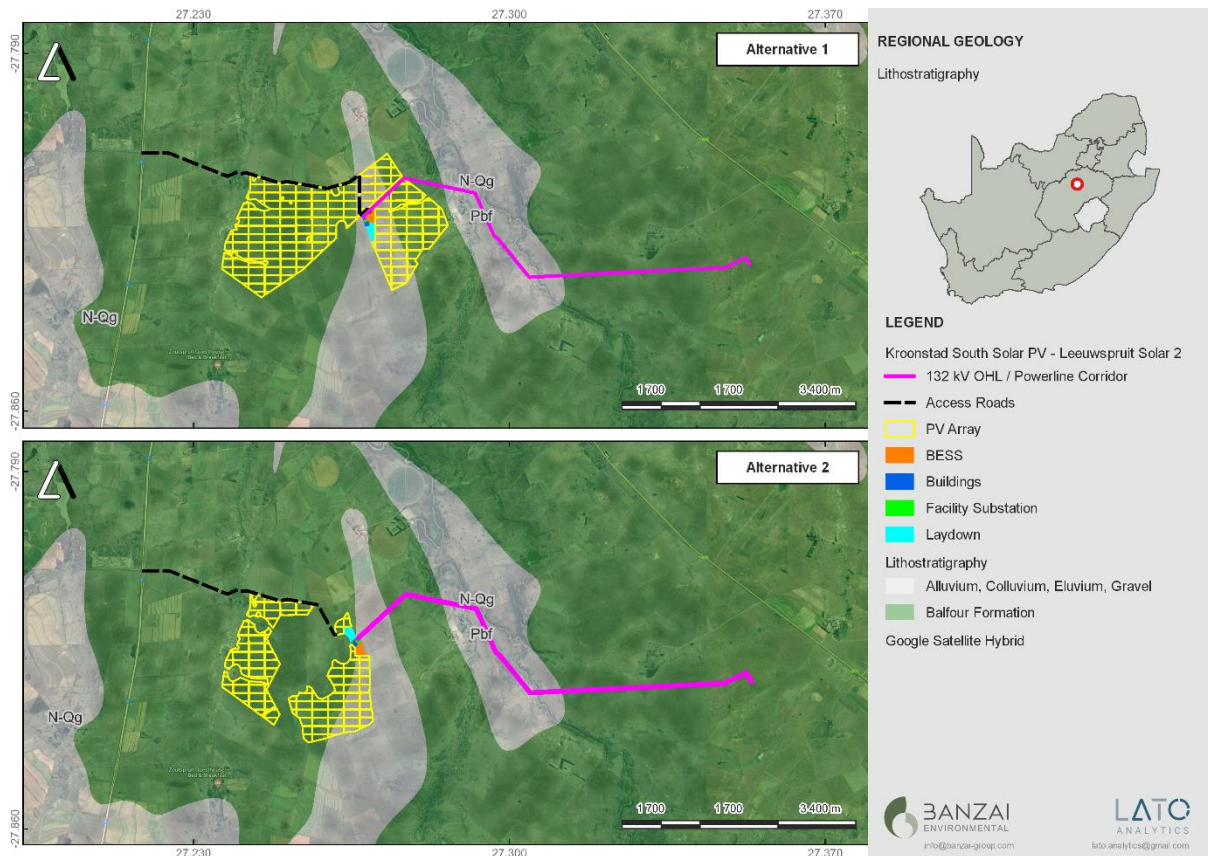


Figure S5: Updated Geology (Council of Geosciences, Pretoria) of the proposed Leeuwspruit Solar 2 PV development south of Kroonstad in the Free State indicates that the development is underlain by alluvium, colluvium, eluvium and gravel as well as the Balfour Formation (Adelaide Subgroup, Beaufort Group, Karoo Supergroup).



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



Screening Report Map

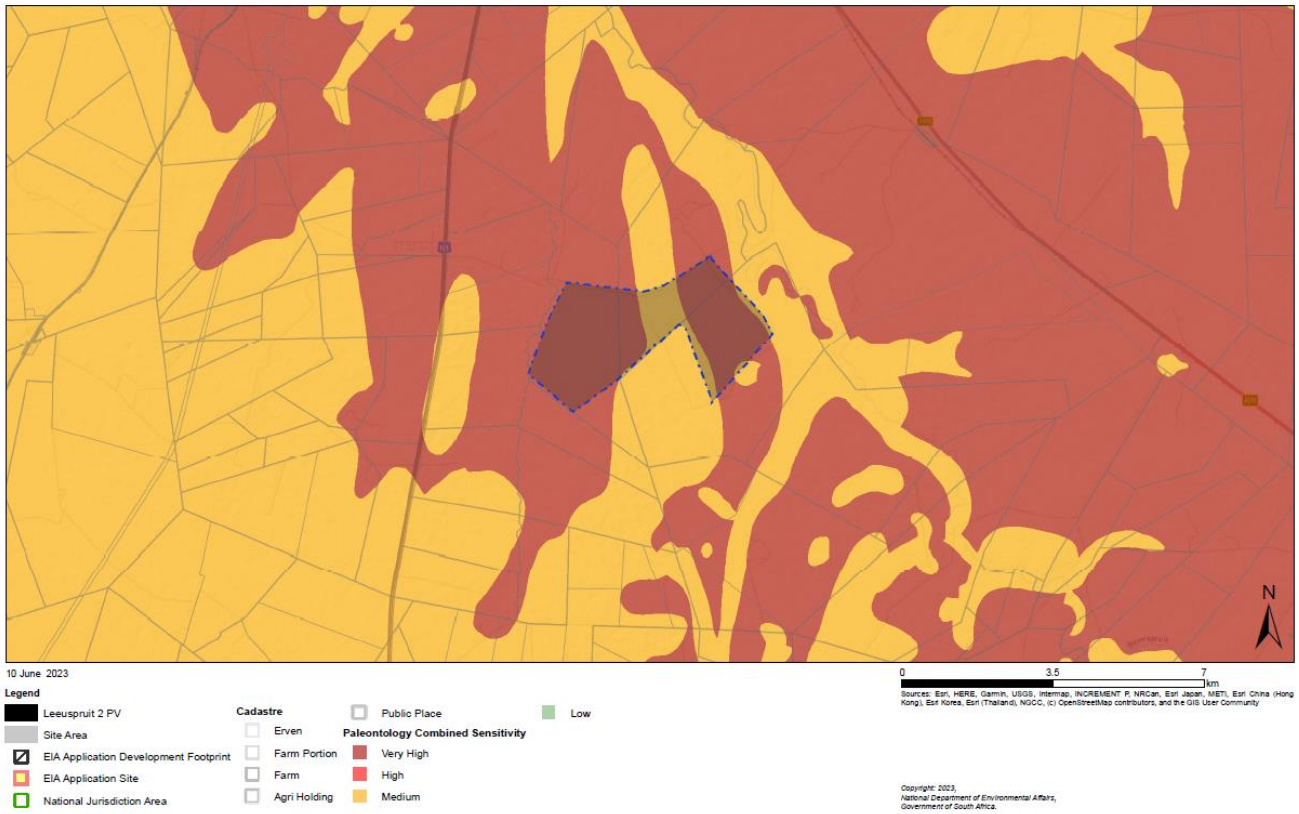


Figure S5: Palaeontological Sensitivity of the Leeuwspruit Solar PV 2 facility by the National Environmental Web-bases Screening Tool.



5. CONCLUSION

The Site Sensitivities of the proposed Leeuwspruit Solar 2 PV has been verified and it was found that:

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

And

- The National Environmental Web-based Screening Tool indicates that the Palaeontological Sensitivity of the development is Very High.

These maps indicate that the proposed Leeuwspruit Solar 2 development is highly Sensitive from a Palaeontological point of view. A site investigation in May 2023 did not detect any fossiliferous outcrops. This classification of the National Environmental Web-bases Screening Tool and SAHRIS Palaeomap is thus questioned here based on actual conditions recorded on the ground during the site visit in May 2023.