PALAEONTOLOGICAL IMPACT ASSESSMENT

SEELO CHARLIE 140 MW SOLAR PV AND BATTERY ENERGY STORAGE SYSTEMS PROJECT, NEAR CARLETONVILLE, NORTH WEST PROVINCE.

2023

COMPILED FOR: NEMAI 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.

PALAEONTOLOGICAL CONSULTANT: Banzai Environmental (Pty) Ltd

CONTACT PERSON: Elize Butler

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Email: elizebutler002@gmail.com

SIGNATURE:

This Palaeontological Impact Assessment (as part of the Heritage 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 in 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 5	-
(cA) An indication of the quality and age of base data used for the specialist report	Section 6 – 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 10	-
(d) The duration, date and season of the site investigation and the relevance of the season to the outcome of the assessment	Section 1;9 & 11	

Table 1: Checklist for Specialist studies in 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.**
(e) a description of the methodology adopted in preparing the report or carrying out the specialised process inclusive of equipment and modelling used	Section 5 Methods and Terms of Reference	-
(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& 11	
(g) An identification of any areas to be avoided, including buffers	Section 1 & 11	
(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 6 – Geological and Palaeontological history	
(i) A description of any assumptions made and any uncertainties or gaps in knowledge;	Section 5.1 – 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 11	
(k) Any mitigation measures for inclusion in the EMPr	Section 1 & 11	
(l) Any conditions for inclusion in the environmental authorisation	Section 1 & 11	
(m) Any monitoring requirements for inclusion in the EMPr or environmental authorisation	Section 12	

Table 1: Checklist for Specialist studies in 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.**
(n)(i) A reasoned opinion as to whether the proposed activity, activities or portions thereof should be authorised and	Section 1 & 11	
(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 & 11	-
(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 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

Table 1: Checklist for Specialist studies in 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.**
		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 4 compliance with SAHRA guidelines	

EXECUTIVE SUMMARY

Banzai Environmental was appointed by Nemai Environmental to conduct the **Palaeontological Impact Assessment** (PIA) to assess the Seelo Charlie 140MW Solar PV and Battery Energy Storage Systems (BESS) Project near Carletonville, in the North West 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 and to evaluate the potential impact of the proposed development on the Palaeontological Heritage of the area.

The Seelo Charlie 140 MW Solar PV and Battery Energy Storage Systems (BESS) Project is entirely underlain by the Malmani Subgroup (Chuniespoort Group, Transvaal Supergroup). According to the PalaeoMap of the South African Heritage Resources Information System (SAHRIS) the Palaeontological Sensitivity of the Malmani Subgroup is Very High (Almond *et al*, 2013; SAHRIS website). This Palaeontological Sensitivity triggered a site investigation. Updated Geology refined the geology of the original geological maps and also indicate that the proposed development is entirely underlain by the Malmani Subgroup.

A site-specific field survey of the development footprint was conducted on foot and by motor vehicle on the weekend of the 13 March 2023. No fossiliferous outcrops were detected during the site visit. 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 Carletonville is considered to be medium pre- mitigation and Low post mitigation 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 significant 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 Stage Seelo Charlie Solar PV	No Impact		No Impact		No Impact
Construction Stage Seelo Charlie Solar PV	Destroy or permanently seal-in fossils at or below the surface that are then no longer available for scientific study	45	Negative Medium impact	15	Negative Low impact
Operational Phase Seelo Charlie Solar PV	No Impact		No Impact		No Impact
Decommissioning Phase Seelo Charlie Solar PV	No Impact		No Impact		No Impact

It is therefore considered that the proposed Seelo Charlie Solar PV Facility, will not lead to detrimental impacts on the palaeontological reserves of the area if mitigation measures are adhered to. As such the construction of the development may be authorised in its whole extent.

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1 INTRODUCTION

Seelo Charlie Solar PV (RF) (Pty) Ltd (the Applicant) has proposed the development of the Seelo Charlie 140MW Solar PV and Battery Energy Storage Systems (BESS) Project near the town of Carletonville, in the North West Province (the "Project"). The electricity generated by the Project will be injected into the existing Eskom 132 kV distribution system. The Applicant intends to bid for the Renewable Energy Independent Power Producer Procurement Programme (REIPPPP) bid windows.

The Project is located in the most eastern part of the North West Province (at the boundary between North West and Gauteng) and falls within the Dr Kenneth Kaunda District Municipality (DKKDM) and the JB Marks Local Municipality (JBMLM). The site is located approximately 13km to the north-west of the town of Carletonville.

The property earmarked for the Project covers a combined area of approximately 1868 ha, of which the buildable area determined by the engineering team is approximately 220 ha.

Seelo Charlie Solar PV and associated infrastructure forms part of the Seelo Cluster comprising of three Solar PV facilities near Carletonville in the North West Province.

Table 2: Details of the affected properties

Farm Name	**21-digit Surveyor General (SG) Code**
Portion 1 of Farm 96 (Rooipan)	T0IQ00000000009600001
Portion 2 of Farm 58 (Leeuwpan)	T0IQ00000000005800002

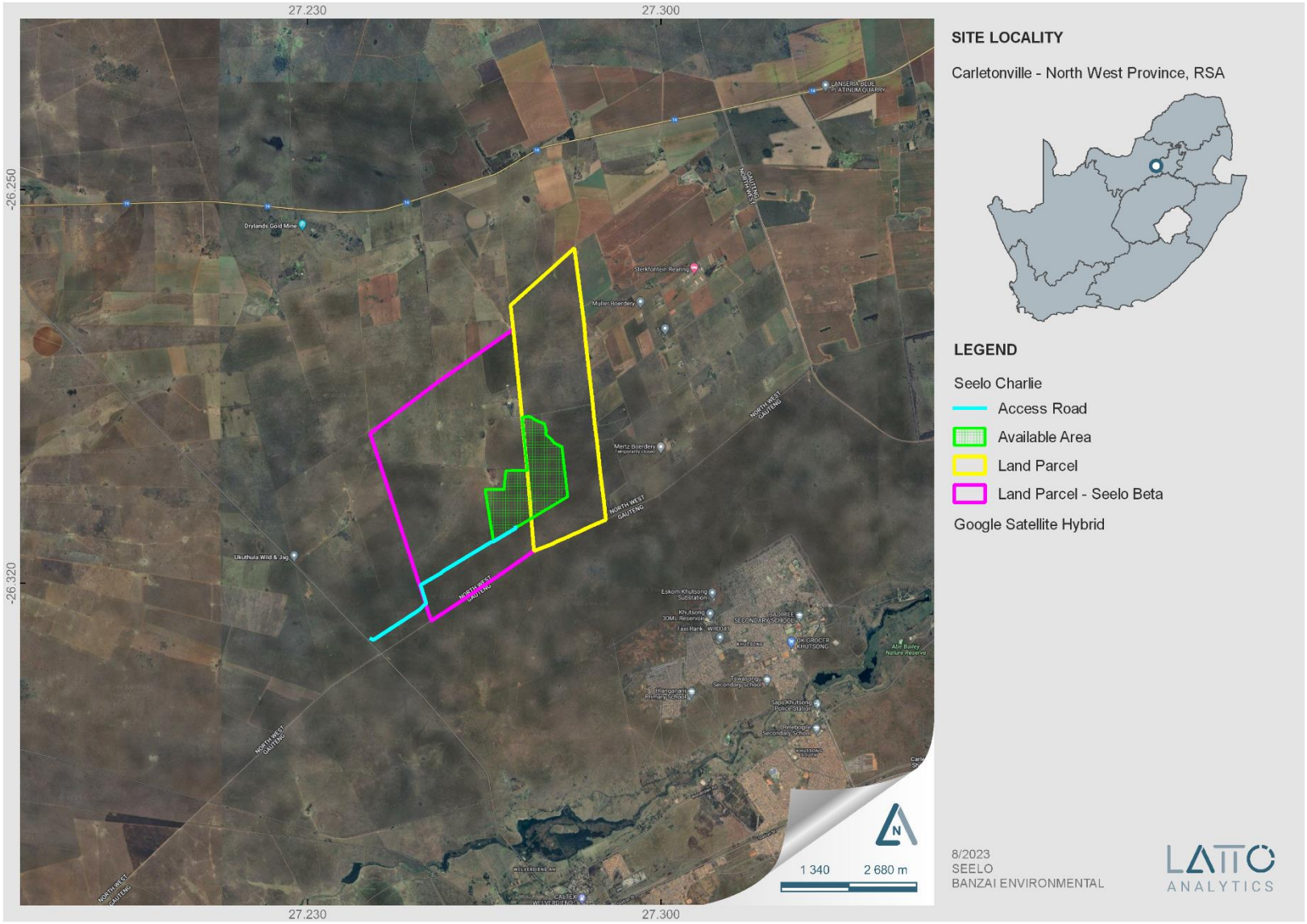


***Figure 1**: Regional context of the Seelo Charlie Solar PV development.*

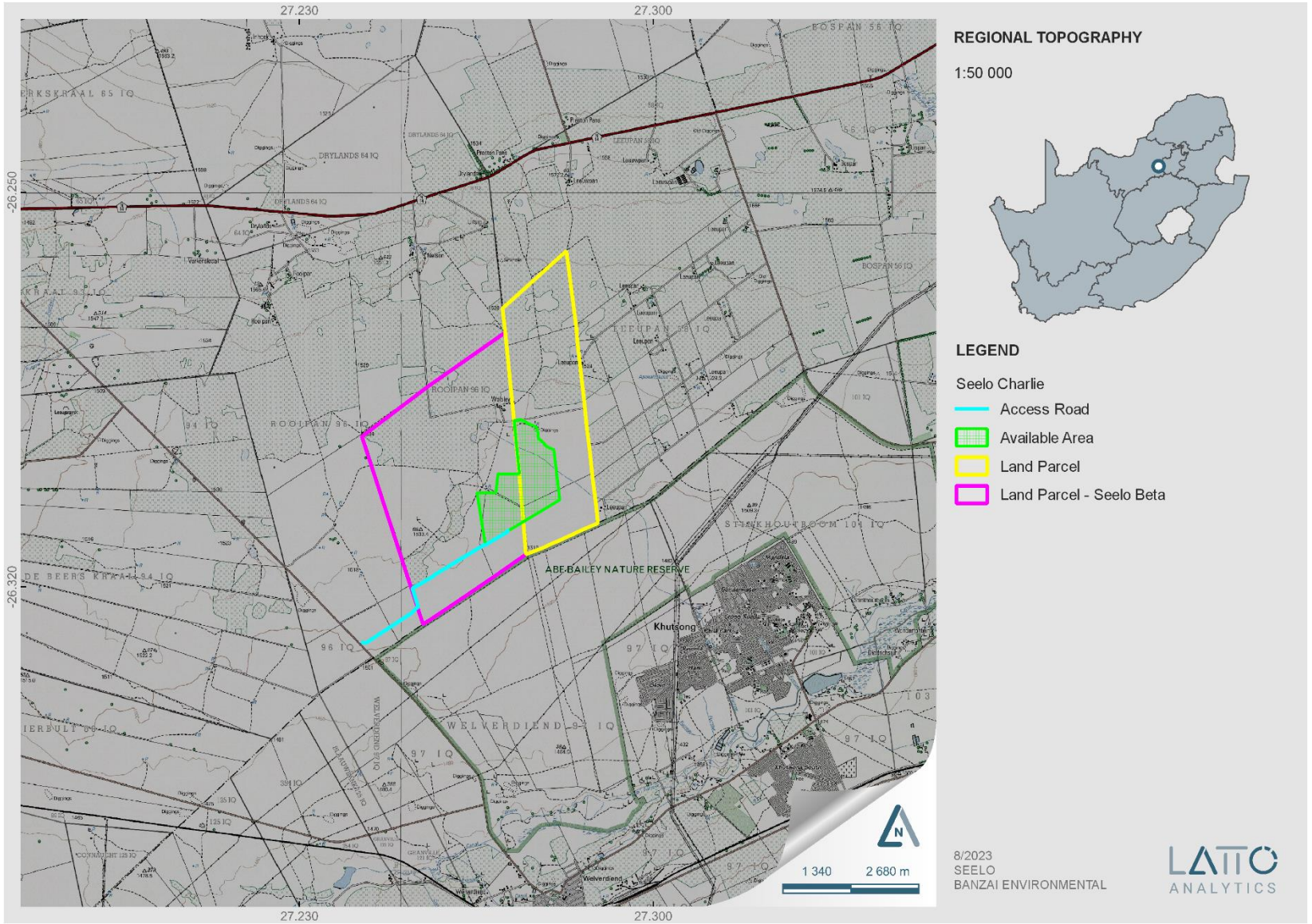


***Figure 2**: Local setting map of the proposed Seelo Charlie Solar PV development.*

2 TECHNICAL DETAILS OF THE PROPOSED DEVLOPMENT

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

- PV panel arrays, which are the subsystems which convert incoming sunlight into electrical energy;
- Mounting structures to support the PV panels;
- On-site inverters to convert DC to facilitate AC connection between the solar energy facility and electricity grid;
- BESS);
- IPP substation;
- Eskom switching substation[1];
- Cabling between the Project's components, to be laid underground (where practical);
- Administration Buildings (Offices);
- Workshop areas for maintenance and storage;
- Temporary and permanent laydown areas;
- Internal access roads and perimeter fencing of the footprint;
- High Voltage (HV) Transformers; and
- Security Infrastructure.

3 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, 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 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

[1] The dedicated grid connection for the proposed Project which includes a 132/33 kV switching substation which does not form part of the current application for EA.

"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 m^2 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 m^2 in extent.
- or any other category of development provided for in regulations by SAHRA or a Provincial heritage resources authority.

5 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 Seelo Charlie Solar PV development area was determined by criss-crossing the development footprint and by physically investigating the bedrock outcrops to determine the lithology and fossil content of the outcrops. Selected potentially fossiliferous sites were specifically investigated. 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).

5.1 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.

6 GEOLOGICAL AND PALAEONTOLOGICAL HISTORY

The Seelo Charlie Solar PV (as part of the Seelo Solar PV Cluster), near Carletonville in the North West Province State is depicted on the 1: 250 000 West-Rand 2626 (1986) Geological Map (Council for Geosciences, Pretoria) (**Figure 3, Table 3**). This map indicates that the proposed development is completely underlain by the Precambrian dolomites and associated marine sedimentary rocks of the of the Malmani Subgroup (Vmd, light blue; Chuniespoort Group, Transvaal Supergroup). The Malmani Subgroup in this area is undifferentiated. According to the PalaeoMap of the South African Heritage Resources Information System (SAHRIS) the Palaeontological Sensitivity of the Malmani Subgroup is

Very High (Almond et al, 2013; SAHRIS website; **Figure 4; Table 5**). Updated geology (Council of Geosciences, Pretoria) refines the geology and also indicates that the proposed development is underlain by the Malmani Subgroup (**Figure 5**). The Palaeotechnical report of the North West Province (Groenewald et al., 2014) indicates that the Malmani Subgroup has a High Palaeontological Sensitivity (**Table 4**). The National Environmental Web-based Screening Tool (**Figure 6**) indicates that the Palaeontological Sensitivity of the development is Very High (dark red).

The Malmani Subgroup is subdivided into five formations (**Figure 7**) that are classified by the amount of chert, stromatolitic morphology, erosion surfaces and intercalated shales in them. The Malmani Subgroup overlies the Black Reef Formation. The oldest Formation in the Malmani Subgroup is the Oaktree Formation that consists of stromatolitic dolomites, carbonaceous shales, and locally developed quartzites. This formation overlies the (Monte Christo Formation that comprises of stromatolitic and oolitic platform dolomites as well as erosive breccia. The Lyttleton Formation overlies the Monte Christo Formation and consists of stromatolitic dolomites as well as shale quartzites. The Eccles Formation follows and comprises of erosional breccias while the youngest Formation is the Frisco Formation that mostly comprises of stromatolitic dolomites.

The Malmani Subgroup carbonates of the Transvaal Basin (**Figure 7**) comprise of an assortment of stromatolites (microbial laminates), ranging from supratidal mats to intertidal columns and large subtidal domes (Eriksson *et al.* 2006). Stromatolites are layered mounds, columns and sheet-like sedimentary rocks (Figure 6). 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. These algae photosynthesised in the low oxygen atmosphere and deposited layer upon layer of calcium sulphate, magnesium sulphate and calcium carbonate as well as other compounds to form these domes. Researchers have examined and classified the stromatolite structures but seldomly find preserved algal cells. The oxygen atmosphere that we depend on today 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, 2001; Buick, 2001; and Schopf, 2006). The Malmani stromatolites literature includes articles by Truswell and Eriksson (1972, 1973, 1975), Eriksson and MacGregor (1981), Eriksson and Altermann (1998), Sumner (2000), Schopf (2006).

The Malmani Subgroup succession is about 2 km-thick and consists of a series of formations of oolitic and stromatolitic carbonates (limestones and dolomites), black carbonaceous shales and minor secondary cherts. The Malmani Dolomites also consist of historic lime mines, and palaeocave fossil deposits. Dolomite (limestone rock) forms in warm, shallow seas from slow gathering remainders of

marine microorganisms and fine-grained sediment. Dolomites of the Malmani Subgroup has a higher magnesium content than other limestones. These materials contain high levels of calcium carbonate and are often referred to as *carbonates*.

Currently very few palaeontologists study stromatolites but geologists find the stromatolites interesting because they reveal the change from a reducing environment (that is an oxygen-poor) to an oxidizing environment (oxygen--rich). This transition is known as the Great Oxygen Event (Eroglu et al., 2017).

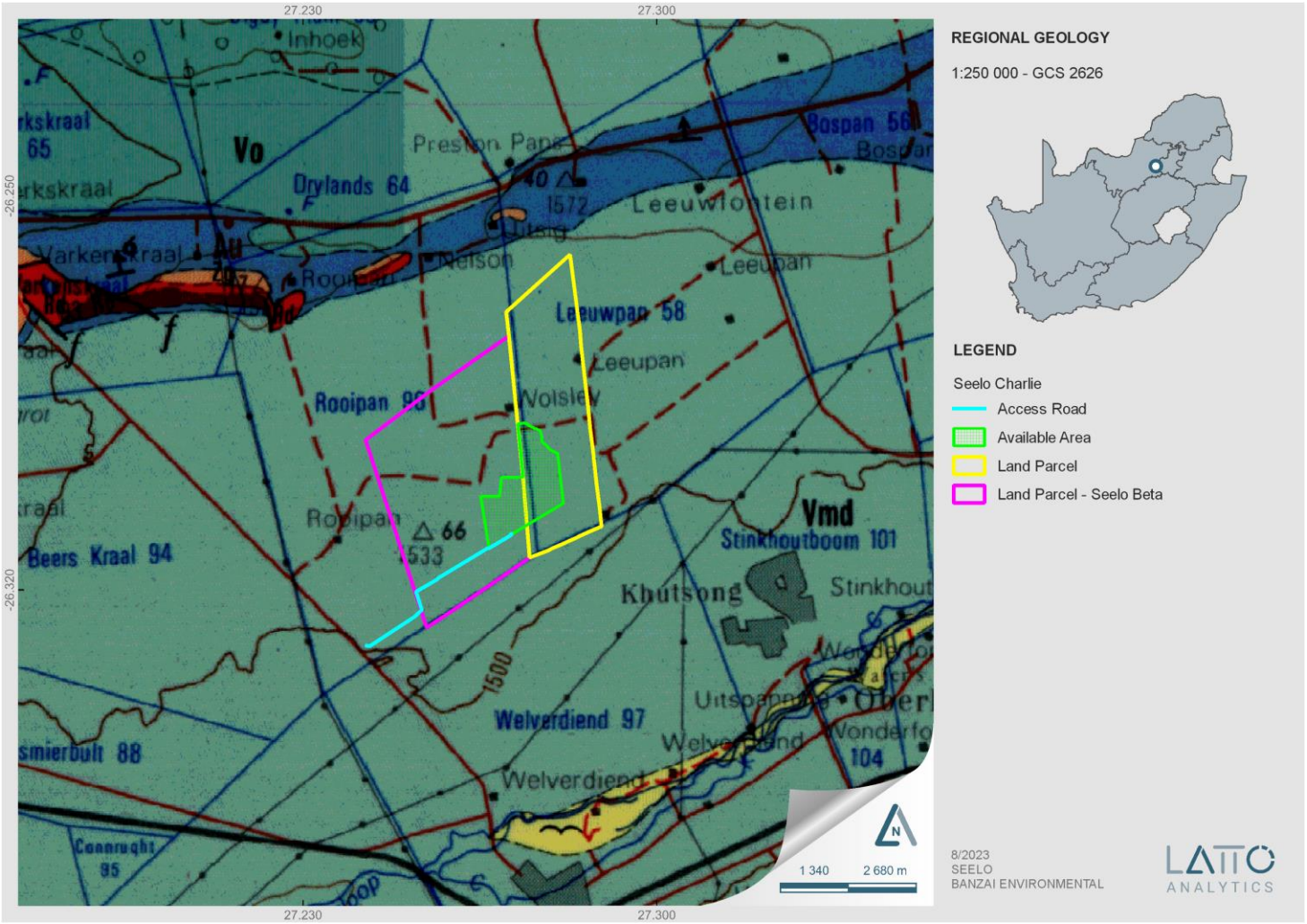
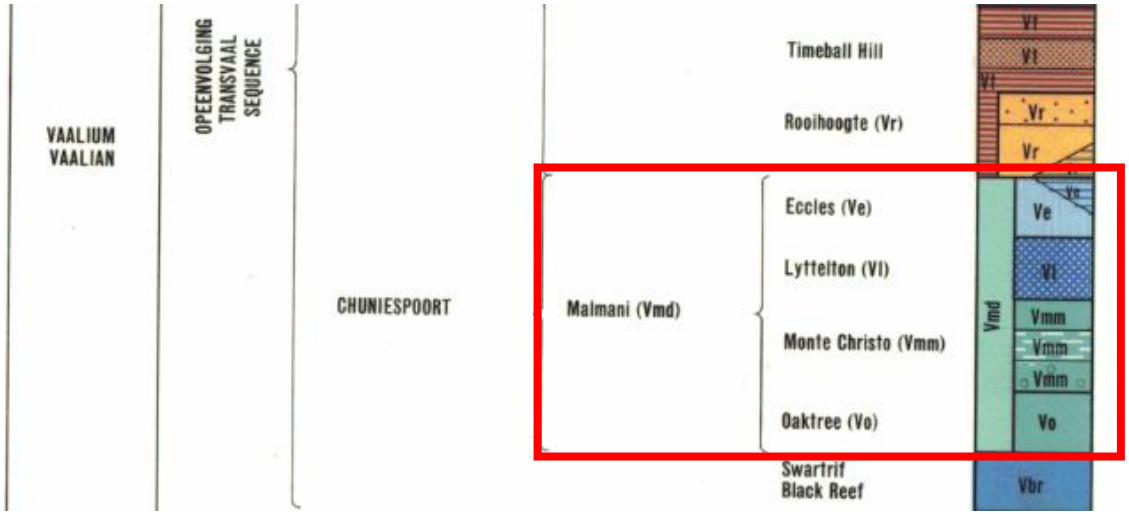


***Figure 3**: Extract of the 1:250 000 West Rand 2626 (1986) Geological Map (Council of Geoscience, Pretoria) indicating that the Seelo Charlie Solar PV development is underlain by the Malmani Subgroup (Chuniespoort Group, Transvaal Supergroup).*

Table 3: Legend of the 2626 West-Rand (1986) Geological Map (Council for Geoscience, Pretoria). Relevant sediments are indicated in a red square.



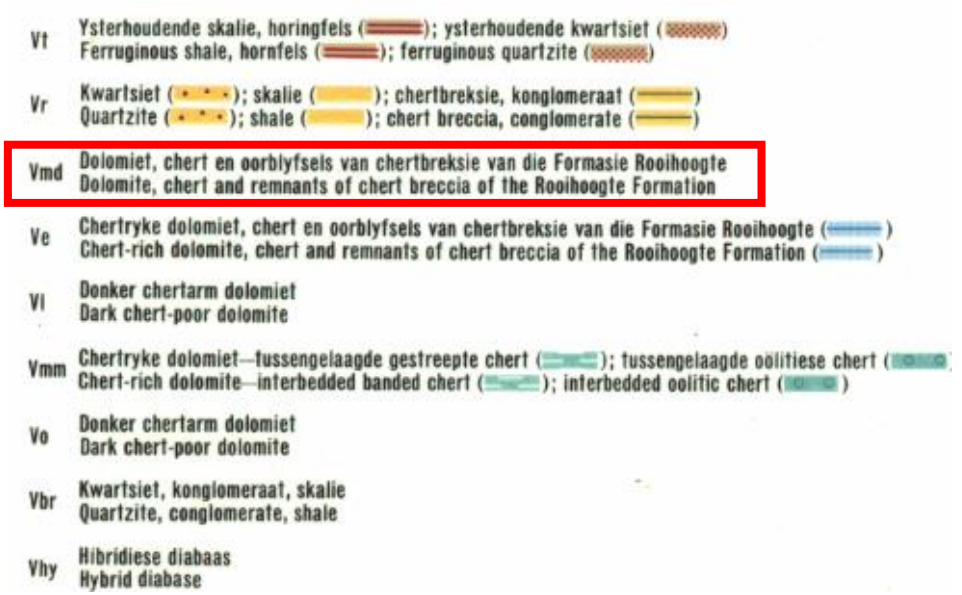


Table 4: Extract of the Palaeotechnical Report of North West Province (Groenewald, et al., 2014) indicating the Superficial sediments.

TRANSVAAL	PRETORIA		Magaliesberg (Vmg)(Vlm)		Coastal sandstones with mudrocks	Microbial mat structures (Desiccated mats sometimes resemble trace fossils)	Pretoria Group subunits with stromatolites probably also contain microfossils. This may also apply to carbonaceous mudrocks. ALERT FOR POTENTIALLY FOSSILIFEROUS LATE CAENOZOIC CAVE BRECCIAS WITHIN OUTCROP AREA OF CARBONATE SUBUNITS – i.e. LIMESTONES & DOLOMITES (breccias not individually mapped) Rooiberg Group was previously included within top of Transvaal Supergroup but now regarded as separate succession
			Silverton (Vsi)		Marine mudrocks with minor carbonates, volcanic rocks (= Machadodorp Member)	Stromatolites	
			Igneous intrusions (Vdi)		Igneous intrusions	No fossils recorded	
			Daspoort (Vda, Vhd, Vdq; Vdp)		Alluvial, fluvial and deltaic sandstones and mudrocks, marine sediments in east	Stromatolites	
			Strubenkop (Vs, Vst; Vhd)		Lacustrine mudrocks with minor sandstone	No fossils recorded	
			Dwaalheuwel (Vdw, Vhd)		Alluvial sandstones, conglomerates and mudrocks	No fossils recorded	
			Hekpoort (Vh, Vhd, Vha)		Volcanics (basalts, pyroclastics) with minor lacustrine shales	No fossils recorded	
			Boshoek (Vb)		Sandstones, conglomerats, diamictite (alluvial fans, slumps)	No fossils recorded	
			Timeball Hill (Vt; Vti)	Klapperkop (Vkp)	Lacustrine and fluvio-deltaic mudrocks with diamictite, conglomerates, quartzite, minor lavas. Shale, siltstone, conglomerate, quartzite	Stromatolites	
			Rooihoogte (Vt)		Basal breccio-conglomerates, quartzites, mudrocks, carbonates (alluvial fan, lakes, karst infill)	No fossils recorded	
	CHUNIESPOORT		Duitschland (Vd)		Conglomerate	No fossils recorded	Good examples of stromatolites in Cradle of Humankind region ALERT FOR POTENTIALLY FOSSILIFEROUS LATE CAENOZOIC CAVE BRECCIAS WITHIN "TRANSVAAL DOLOMITE" OUTCROP AREA (breccias not individually mapped)
			Penge (Vp)		Iron-rich shale	Stromatolites	
		Malmani (Vm; Vmd; Vma)			Stromatolitic carbonates (limestones / dolomites), minor secondary cherts, mudrocks including carbonaceous shales	Range of shallow marine to intertidal stromatolites (domes, columns etc), organic-walled microfossils	
			Black Reef (Vbr)		Siliciclastic sediments (mature sandstones plus minor mudrocks, conglomerates) deposited during a fluvial to shallow marine transition	Possible equivalent of Black Reef Fm in N. Cape (Vryburg Formation) contains stromatolitic carbonates	

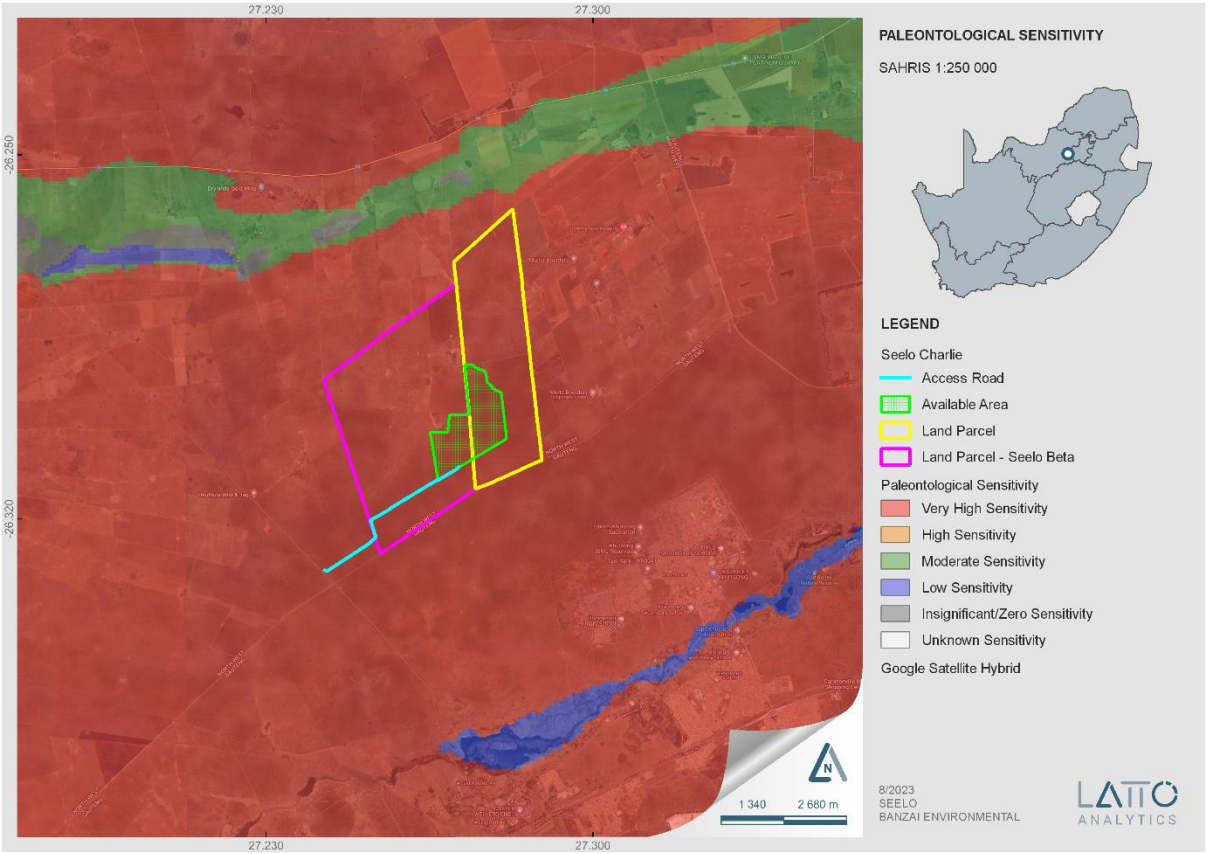


***Figure 4**: Extract of the 1: 250 000 SAHRIS PalaeoMap map (Council of Geosciences) indicating the proposed Seelo Charlie Solar PV development.*

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 PalaeoMap of the South African Heritage Resources Information System (**Figure 4, Table 5**) indicates that the Palaeontological Sensitivity of the Seelo Charlie Solar PV development is Very High (red) (Almond and Pether, 2009; Almond *et al*., 2013).

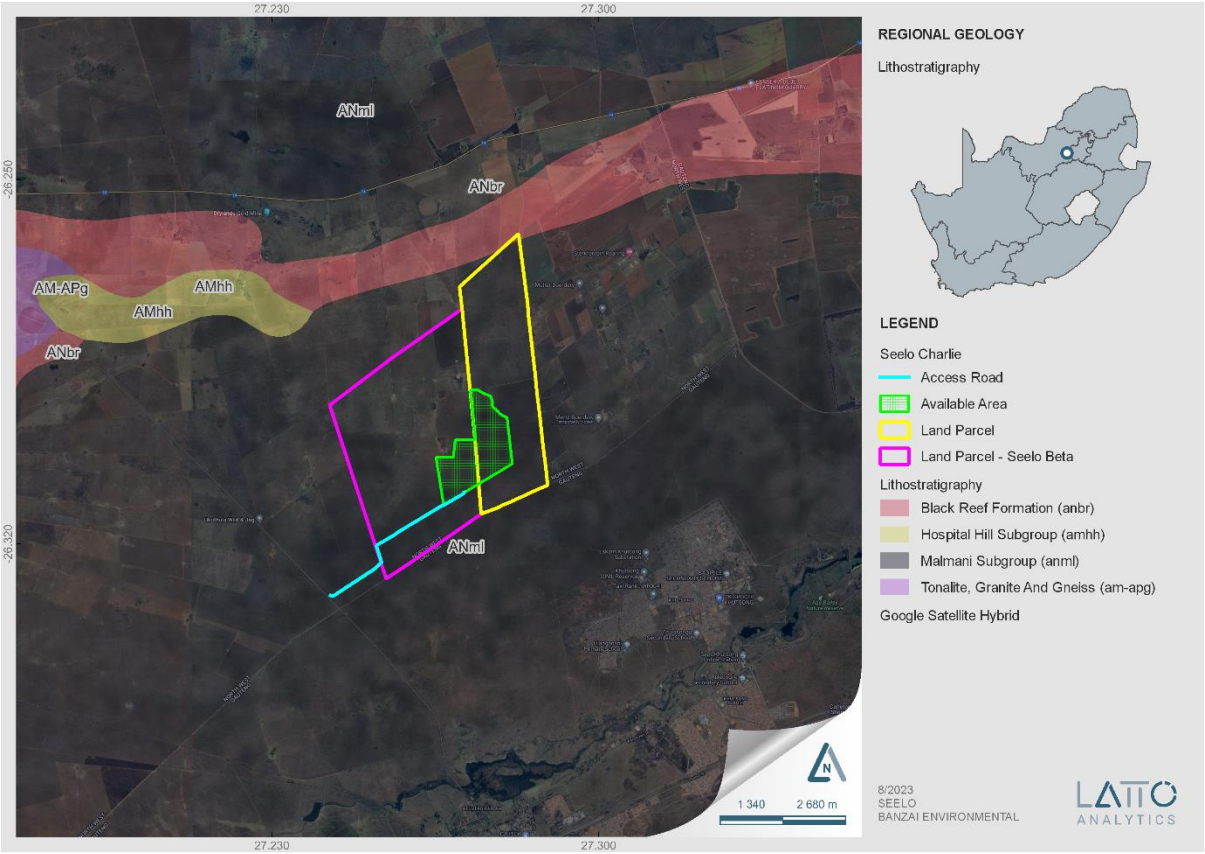
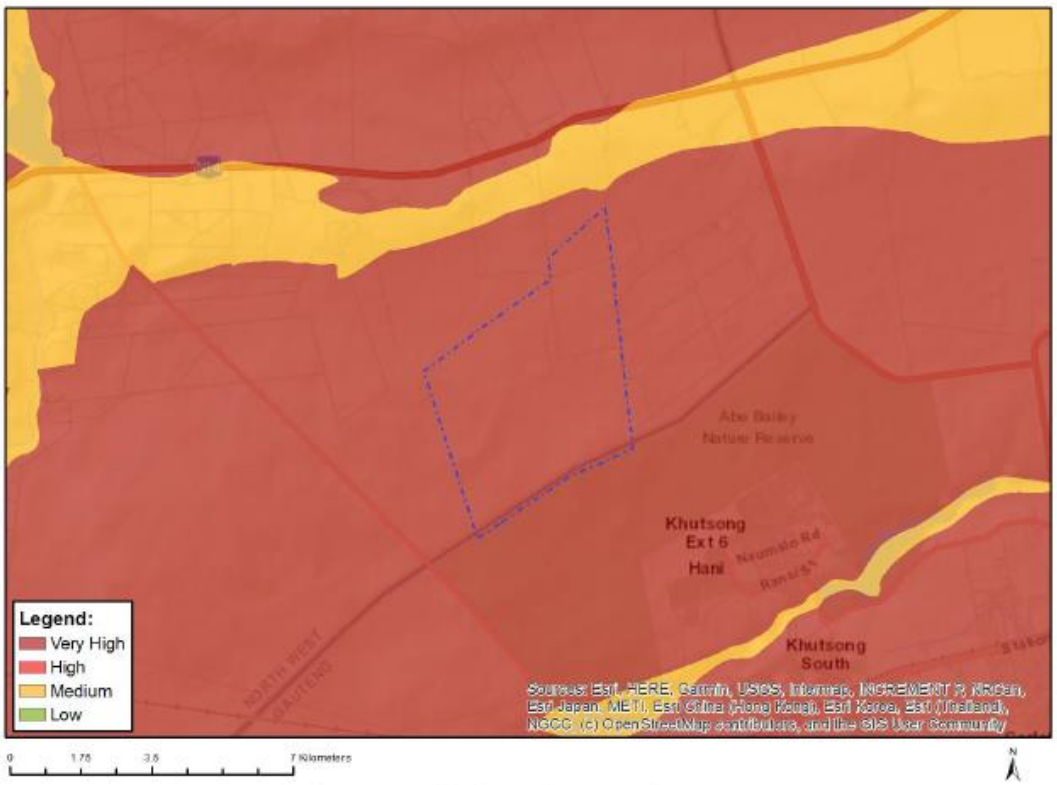


***Figure 5**: Updated Geology (Council of Geosciences) indicates that the proposed Seelo Charlie Solar PV development and associated infrastructure is underlain by the Malmani Subgroup (Chuniespoort Group, Transvaal Supergroup).*

MAP OF RELATIVE PALEONTOLOGY THEME SENSITIVITY



Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
X			

Sensitivity Features:

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

***Figure 6**:Palaeontological Sensitivity of the Seelo Charlie Solar PV 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).

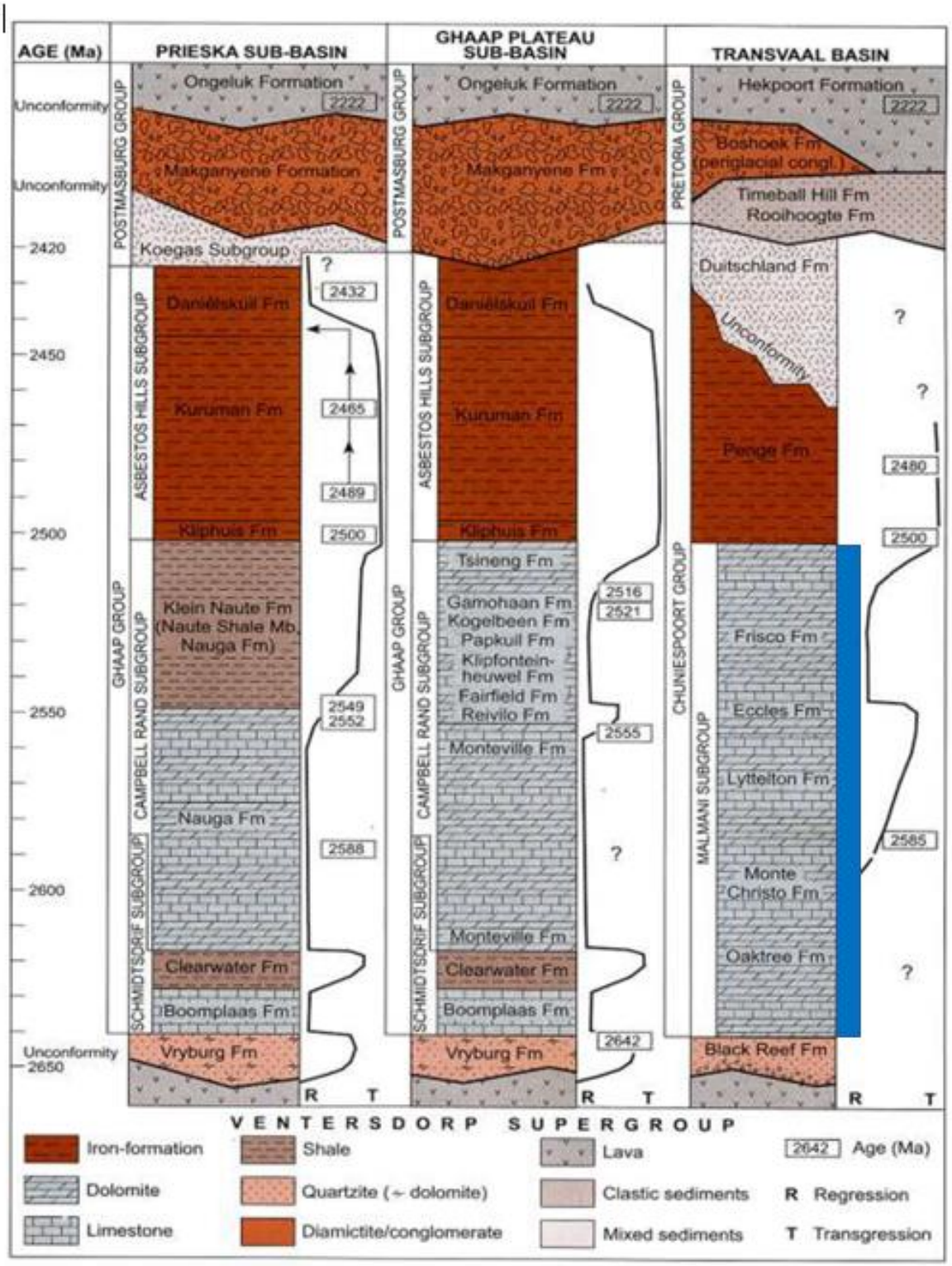


Figure 7: Stratigraphy of the Transvaal Supergroup of the Transvaal Basin. The proposed sediments underlying the development is indicated in blue (Eriksson, et al. 2006).

The general Palaeontological Sensitivity of the area is Low to Very High (see SAHRIS Palaeomap (**Figure 4)**. However, it is important to note that the quality of preservation of these different sites will most probably vary and it is thus difficult to allocate a **Cumulative Sensitivity** to the projects. If all the mitigation measures are carried out, a conservative estimate of the Cumulative impacts on fossil Heritage will vary between Low and Medium.

7 GEOGRAPHICAL LOCATION OF THE SITE

The proposed development is located at the boundary between North West and Gauteng Province and falls within the Dr Kenneth Kaunda District Municipality (DKKDM) and the JB Marks Local Municipality (JBMLM). The site is located approximately 13km to the north-west of the town of Carletonville. The D331 road bisects the site **(Figure 1-2**).

8 ADDITIONAL INFORMATION CONSULTED

In compiling this report the following sources were consulted:

- 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 March 2023.
- 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 Nemai Environmental.
- 1: 250 000 West-Rand 2626 (1986) Geological Map (Council for Geosciences, Pretoria).

9 SITE VISIT

A site-specific field survey of the development footprint was conducted on foot and by motor vehicle on 13 March 2023. No fossiliferous outcrops were identified in the development site.

***Figure 8**: General view overlooking the development depicts open plains with grassy vegetation.*

***Figure 9**: Surface dolomites scattered throughout the development.*

10 IMPACT ASSESSMENT METHODOLOGY

10.1 Method of Environmental Assessment

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 below.

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.

10.2 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 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 Impact ratings

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

	Extent	Duration	Magnitude	Reversibility	Irreplicable loss	Cumulative effect	Impact Significance
Pre-Mitigation	1	4	3	4	4	2	45
Post-Mitigation	1	4	1	4	4	2	15

11 FINDINGS AND RECOMMENDATIONS

The Seelo Charlie 140 MW Solar PV and Battery Energy Storage Systems (BESS) Project is entirely underlain by the Malmani Subgroup (Chuniespoort Group, Transvaal Supergroup). According to the PalaeoMap of the South African Heritage Resources Information System (SAHRIS) the Palaeontological Sensitivity of the Malmani Subgroup is Very High (Almond *et al*, 2013; SAHRIS website). The Very High Palaeontological Sensitivity of the development triggered a site investigation. Updated Geology refined the geology of the original geological maps and also indicate that the proposed development is entirely underlain by the Malmani Subgroup.

A site-specific field survey of the development footprint was conducted on foot and by motor vehicle on the weekend of the 13 March 2023. No fossiliferous outcrops were detected during the site visit. 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 Carletonville is considered to be medium pre- mitigation and Low post mitigation 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 significant 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.

12 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

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PALAEONTOLOGICAL SITE VERIVICATION REPORT

Seelo Charlie Solar PV

(Part of the Seelo Solar PV Cluster)

CONTENTS

1. INTRODUCTION

Seelo Charlie Solar PV (RF) (Pty) Ltd (the Applicant) has proposed the development of the Seelo Charlie 140MW Solar PV and Battery Energy Storage Systems (BESS) Project near the town of Carletonville, in the North West Province (the "Project"). The electricity generated by the Project will be injected into the existing Eskom 132 kV distribution system. The Applicant intends to bid for the Renewable Energy Independent Power Producer Procurement Programme (REIPPPP) bid windows.

The Project is located in the most eastern part of the North West Province (at the boundary between North West and Gauteng) and falls within the Dr Kenneth Kaunda District Municipality (DKKDM) and the JB Marks Local Municipality (JBMLM). The site is located approximately 13km to the north-west of the town of Carletonville (**Figure S1-S2**).

The property earmarked for the Project covers a combined area of approximately 1868 ha, of which the buildable area determined by the engineering team is approximately 220 ha.

Table S1: *Details of the affected properties*

Farm Name	**21-digit Surveyor General (SG) Code**
Portion 1 of Farm 96 (Rooipan)	T0IQ00000000009600001
Portion 2 of Farm 58 (Leeuwpan)	T0IQ00000000005800002

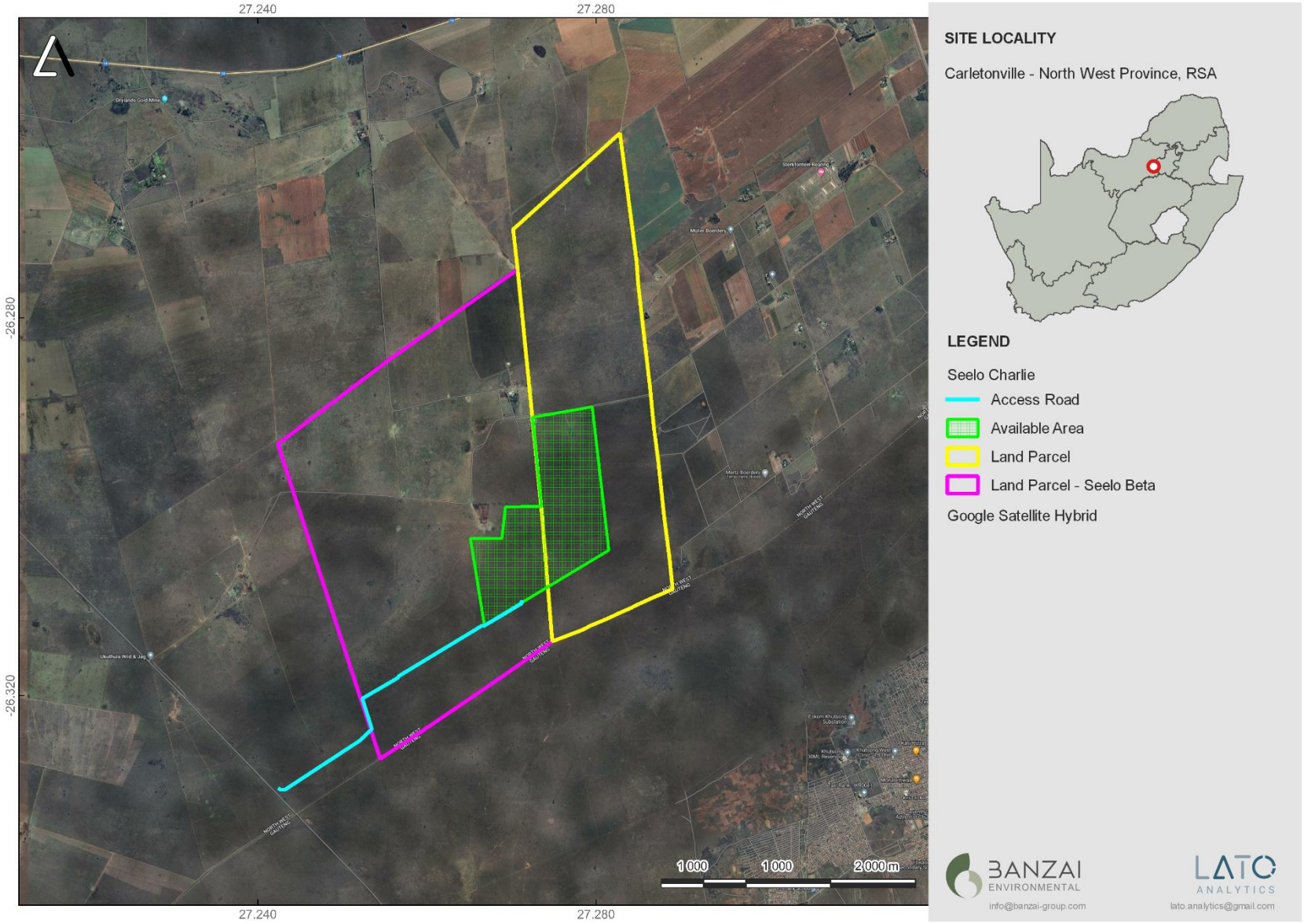


Figure S1: *Regional context of the Seelo Charlie Solar PV development.*

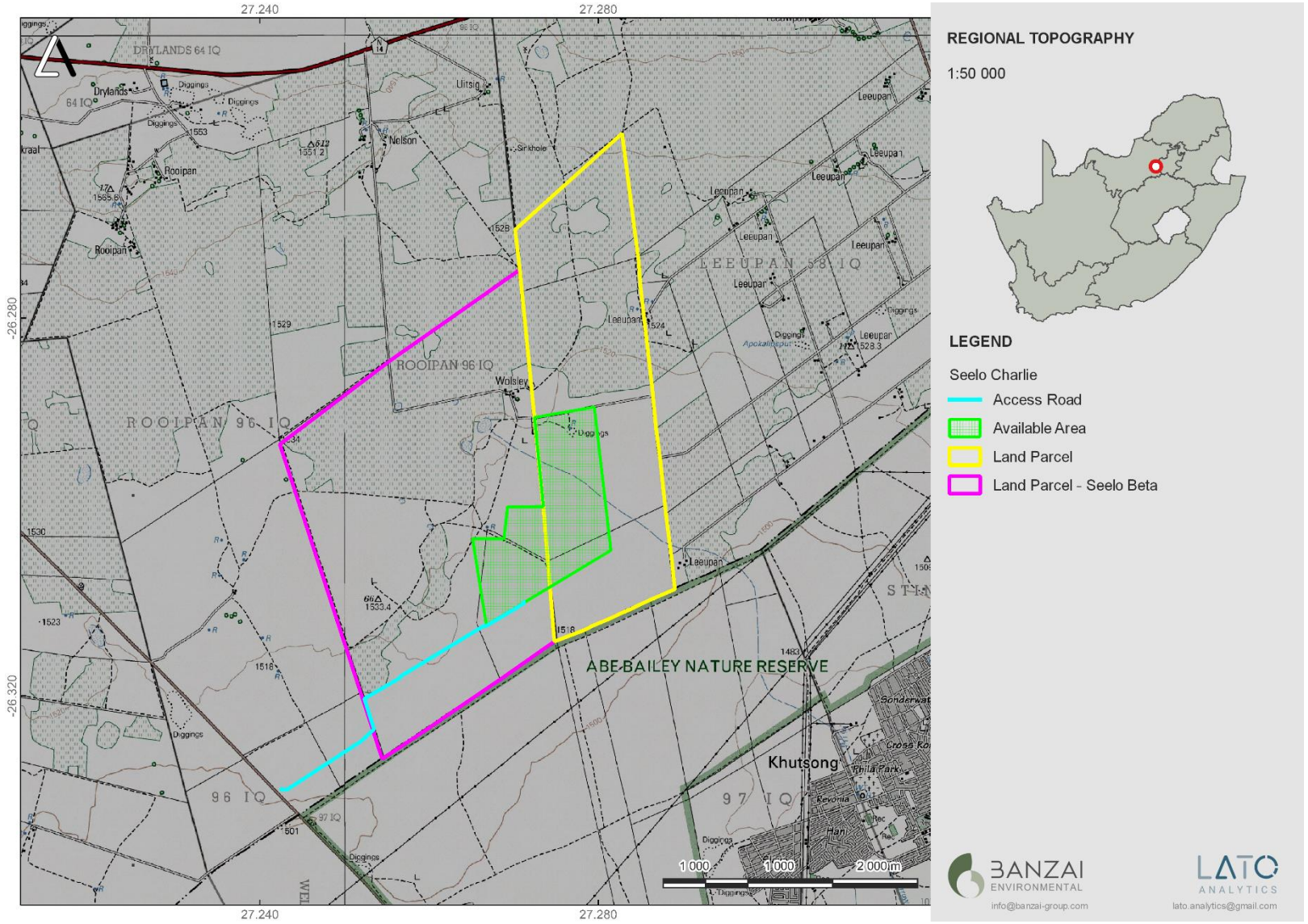


Figure S2: *Local setting map of the proposed Seelo Charlie Solar PV development.*

2. TECHNICAL DETAILS FOR THE PROPOSED DEVELOPMENT

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

- PV panel arrays, which are the subsystems which convert incoming sunlight into electrical energy;
- Mounting structures to support the PV panels;
- On-site inverters to convert DC to facilitate AC connection between the solar energy facility and electricity grid;
- BESS);
- IPP substation;
- Eskom switching substation[2];
- Cabling between the Project's components, to be laid underground (where practical);
- Administration Buildings (Offices);
- Workshop areas for maintenance and storage;
- Temporary and permanent laydown areas;
- Internal access roads and perimeter fencing of the footprint;
- High Voltage (HV) Transformers; and
- Security Infrastructure.

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 Department of Small Business Development, Tourism and Environmental Affairs (DESTEA), prior to the commencement thereof.

In accordance with GN 320 of 20 March 2020 and GN 1150 of 30 October 2020[3] (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 Tool (i.e., Screening Tool). Elize Butler as Palaeontology Specialist have been commissioned to verify the sensitivity of the Seelo Charlie Solar PV Cluster and associated infrastructure site under these specialist protocols.

[2] The dedicated grid connection for the proposed Project which includes a 132/33 kV switching substation which does not form part of the current application for EA.

[3] 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

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 March 2023.

4. OUTCOME OF SITE SENSITIVITY VERIFICATION

The Seelo Charlie Solar PV (as part of the Seelo Solar PV Cluster), near Carletonville in the North West Province State is depicted on the 1: 250 000 West-Rand 2626 (1986) Geological Map (Council for Geosciences, Pretoria) (**Figure 3, Table 2**). This map indicates that the proposed development is completely underlain by the Precambrian dolomites and associated marine sedimentary rocks of the of the Malmani Subgroup (Vmd, light blue; Chuniespoort Group, Transvaal Supergroup).

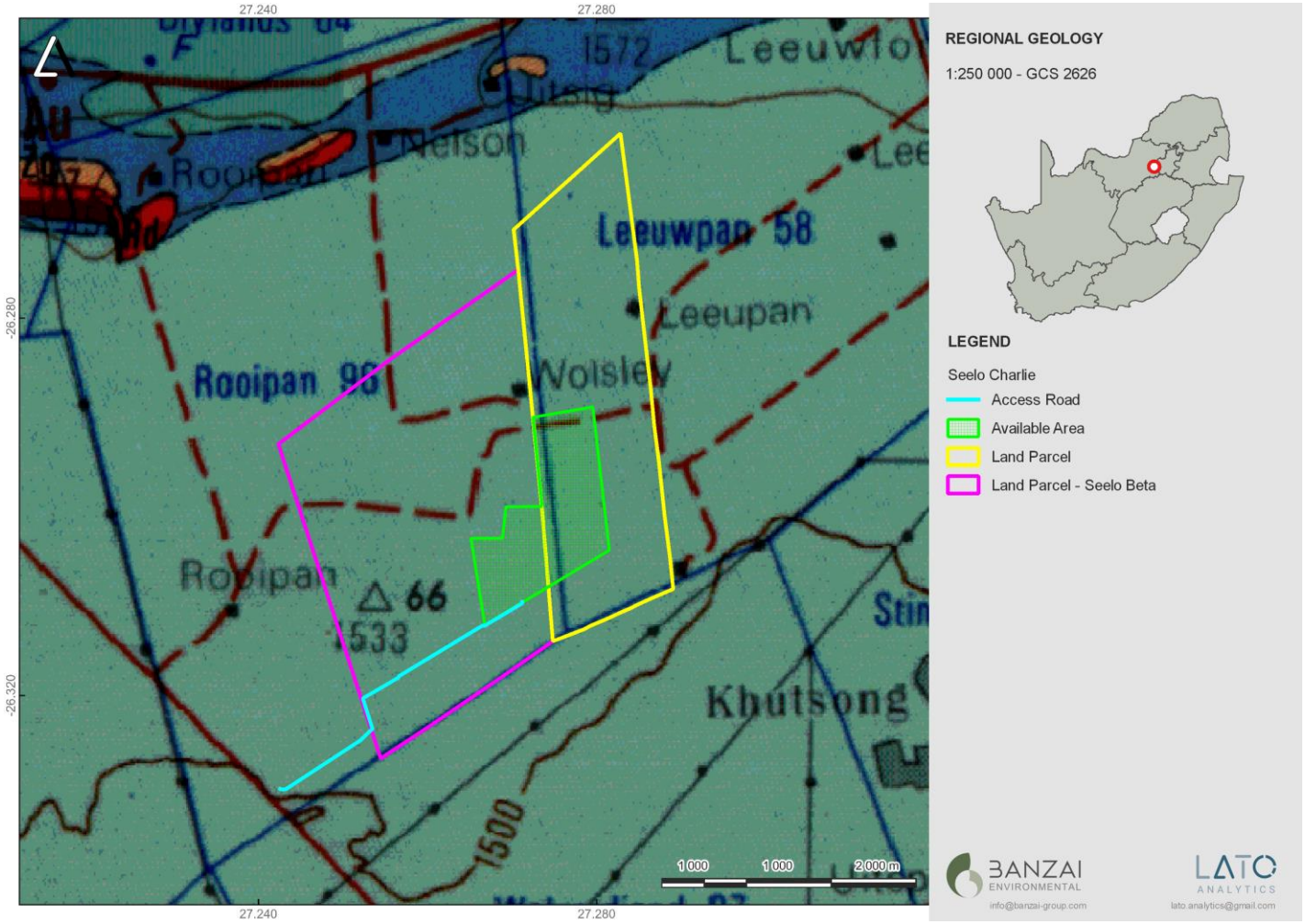
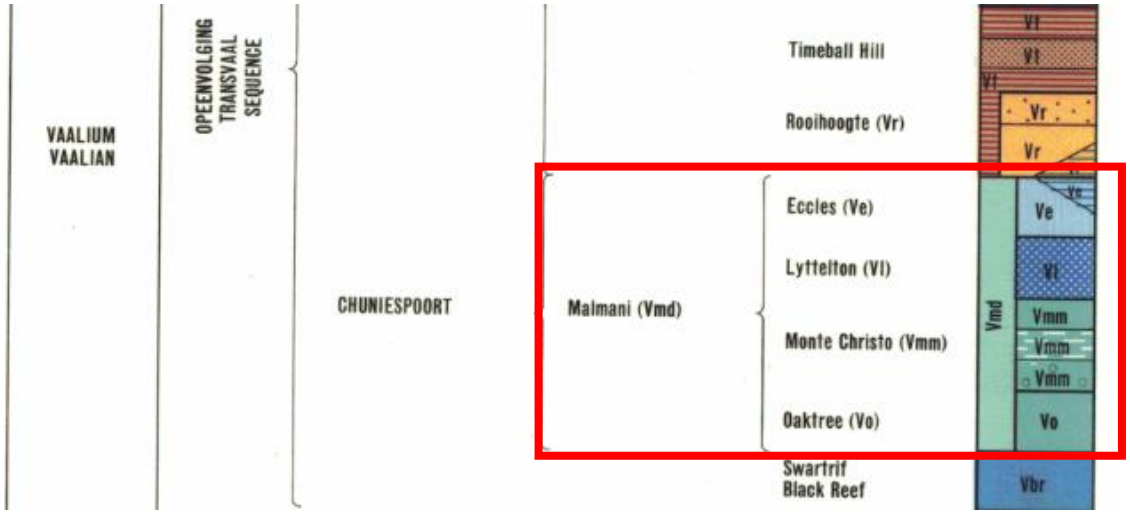


Figure S3: *Extract of the 1:250 000 West Rand 2626 (1986) Geological Map (Council of Geoscience, Pretoria) indicating that the Seelo Charlie Solar PV development is underlain by the Malmani Subgroup (Chuniespoort Group, Transvaal Supergroup).*

Table S2 *Legend of the 2626 West-Rand (1986) Geological Map (Council for Geoscience, Pretoria).Relevant sediments are indicated in a red square*



Vt	Ysterhoudende skalie, horingfels; ysterhoudende kwartsiet Ferruginous shale, hornfels; ferruginous quartzite
Vr	Kwartsiet; skalie; chertbreksie, konglomeraat Quartzite; shale; chert breccia, conglomerate
Vmd	Dolomiet, chert en oorblyfsels van chertbreksie van die Formasie Rooihoogte Dolomite, chert and remnants of chert breccia of the Rooihoogte Formation
Ve	Chertryke dolomiet, chert en oorblyfsels van chertbreksie van die Formasie Rooihoogte Chert-rich dolomite, chert and remnants of chert breccia of the Rooihoogte Formation
Vl	Donker chertarm dolomiet Dark chert-poor dolomite
Vmm	Chertryke dolomiet—tussengelaagde gestreepte chert; tussengelaagde oolitiese chert Chert-rich dolomite—interbedded banded chert; interbedded oolitic chert
Vo	Donker chertarm dolomiet Dark chert-poor dolomite
Vbr	Kwartsiet, konglomeraat, skalie Quartzite, conglomerate, shale
Vhy	Hibridiese diabaas Hybrid diabase

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

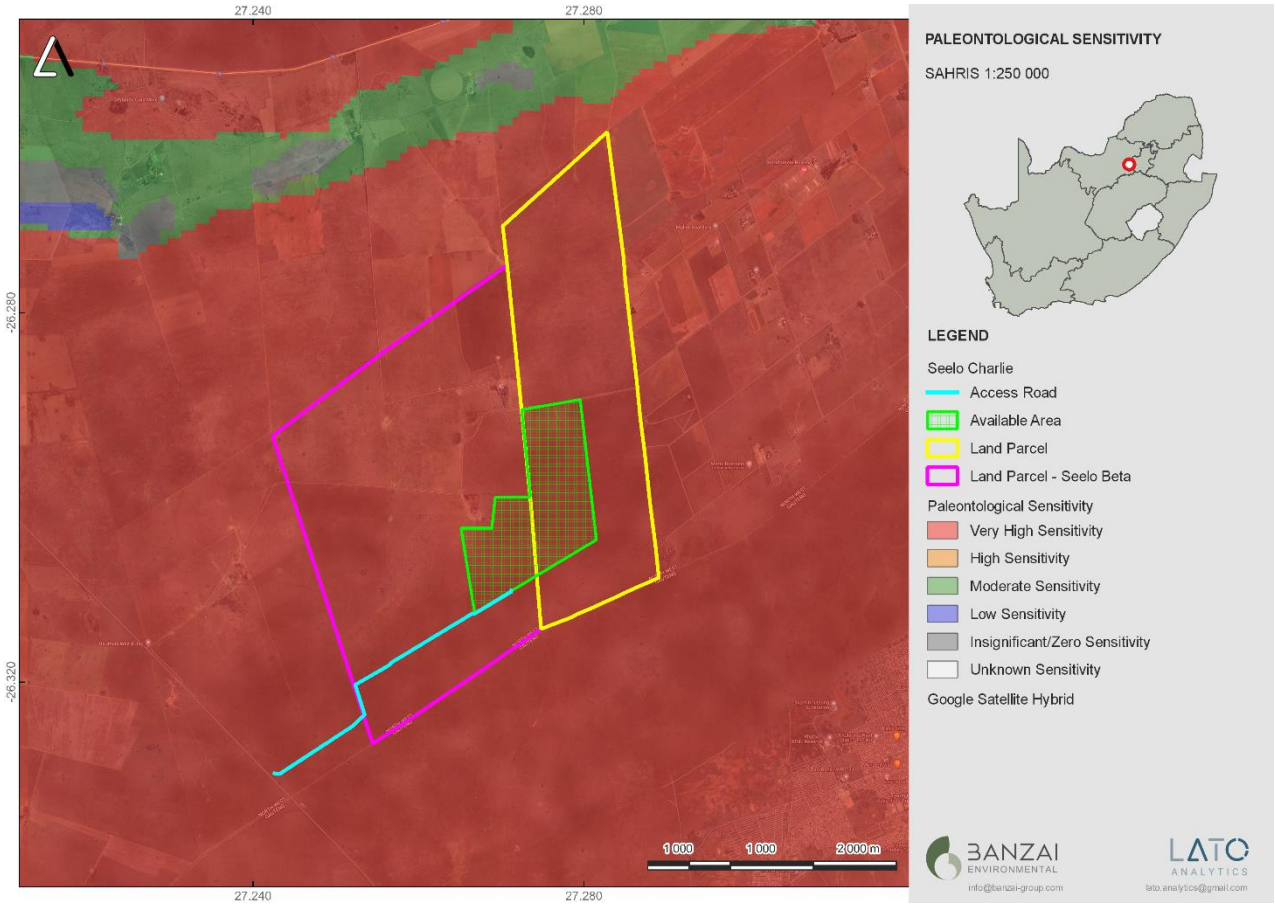
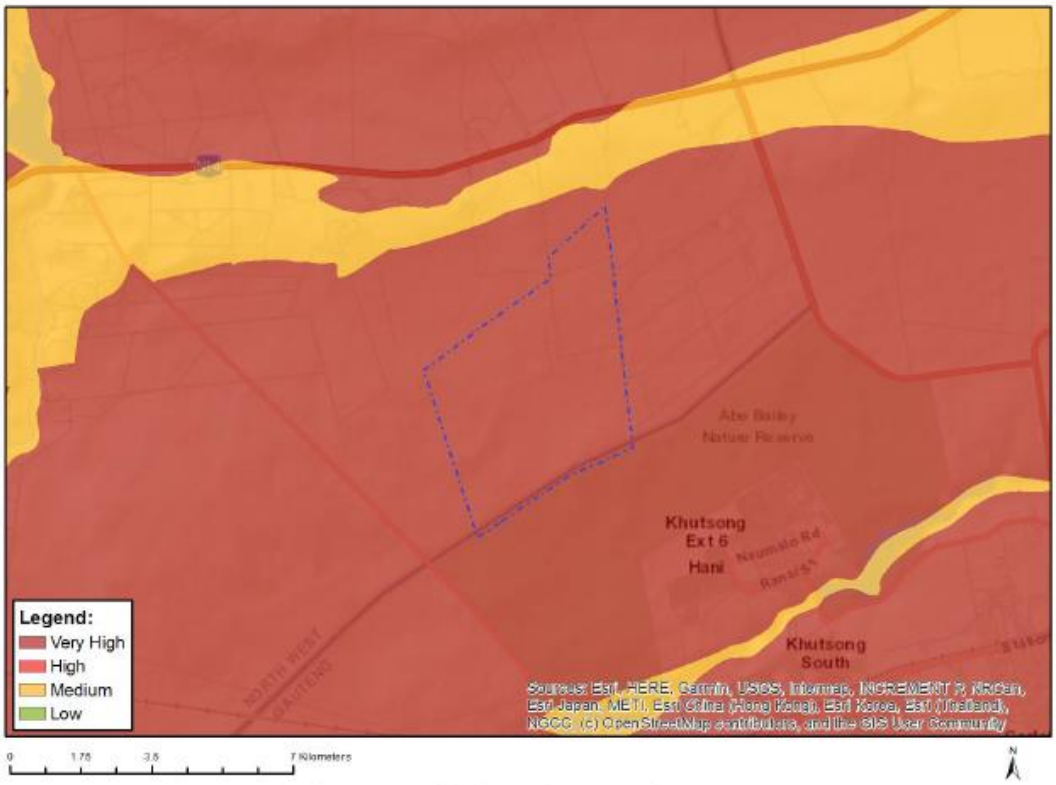


Figure S4: *Extract of the 1: 250 000 SAHRIS PalaeoMap map (Council of Geosciences) indicating the proposed Seelo Charlie Solar PV development.*

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 Seelo Charlie Solar PV development is Very High (red) (Almond and Pether, 2009; Almond *et al*., 2013).

MAP OF RELATIVE PALEONTOLOGY THEME SENSITIVITY



Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
X			

Sensitivity Features:

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

Figure S5: *Palaeontological Sensitivity of the Seelo Charlie Solar PV 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).

5. CONCLUSION

The Site Sensitivities of the proposed Seelo Charlie Solar 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 (dark red).

These maps indicate that the proposed Seelo Charlie Solar PV development is highly Sensitive from a Palaeontological point of view. However, a site investigation in March of 2023 did not detect any fossiliferous outcrops. This classification of the National Environmental Web-bases Screening Tool and SAHRIS is thus contested as far as the impact of the Seelo Charlie Solar PV development is concerned, based on actual conditions recorded on the ground during the site visit in March 2023. A Low Palaeontological Sensitivity has thus been allocated to the development footprint.