DESKTOP PALAEONTOLOGICAL IMPACT ASSESSMENT
PROPOSED GILLIMBERG SOLAR PHOTOVOLTAIC (PV) FACILITY AND ASSOCIATED INFRASTRUCTURE - PHASE 1

COMPILED FOR: Abantu Environmental Services (Pty) Ltd

Desktop Palaeontological Impact Assessment (Phase 2)

SPECIALIST DECLARATION OF INDEPENDENCE

I, Dr Silindokuhle Mavuso, declare that I am an independent specialist and have no business, financial, personal or other interest in the proposed development, apart from fair remuneration for work performed in connection with this assessment. I have conducted this assessment objectively and in accordance with the applicable professional and heritage-management requirements.

EXECUTIVE SUMMARY

Abantu Environmental Services (Pty) Ltd commissioned this specialist study to determine whether the northern portion of the proposed Gillimberg Solar Energy Facility could affect palaeontological heritage resources. Dr Silindokuhle Mavuso completed the assessment independently as a desktop investigation. The study meets the specialist-reporting requirements of Appendix 6 of the Environmental Impact Assessment Regulations, 2014, issued under the National Environmental Management Act (Act No. 107 of 1998).

Phase 2 represents the northern component of the Gillimberg Solar Photovoltaic (PV) Facility in the Mogalakwena Local Municipality, Waterberg District Municipality, Limpopo Province. It is planned as an approximately 200 MW development forming part of the wider 400 MW Gillimberg project. The proposed infrastructure includes ground-mounted bifacial PV modules mounted on single-axis trackers, inverter and transformer stations, an IPP substation and switching station, internal roads, temporary construction areas and related electrical infrastructure. Grid connection will be provided through the associated 132 kV infrastructure linking the project to the Eskom Borutho Main Transmission Substation.

Review of the regional geological mapping indicates that the northern Phase 2 footprint occupies the same crystalline geological terrain as the adjacent southern phase. The site is associated with high-grade metamorphic rocks of the Limpopo Belt, particularly the Hout River Gneiss of the Southern Marginal Zone. These rocks underwent intense Neoarchaean metamorphism and recrystallisation and are not capable of preserving fossils. No mapped sedimentary formation with palaeontological potential occurs within the Phase 2 footprint.

The SAHRIS Palaeosensitivity Map assigns insignificant to zero sensitivity to the geological units underlying this part of the Gillimberg development. The desktop review identified no recorded fossil localities, fossil-bearing units or palaeontological sites within or immediately surrounding the Phase 2 area.

The proposed Phase 2 works are therefore not expected to cause a material impact on palaeontological heritage. A pre-construction field assessment is not warranted. Nevertheless, a Fossil Chance Find Protocol should form part of the Environmental Management Programme (EMPr) so that any unexpected material exposed during earthworks can be reported and managed appropriately.

1. INTRODUCTION

Abantu Environmental Services (Pty) Ltd appointed Mr Silindokuhle Mavuso, an independent palaeontologist and geologist, to assess the northern Phase 2 footprint of the proposed Gillimberg Solar Photovoltaic (PV) Facility and its associated infrastructure. This report is a separate Desktop Palaeontological Impact Assessment prepared specifically for Phase 2 within the Mogalakwena Local Municipality, Waterberg District Municipality, Limpopo Province.

This report has been prepared in accordance with the requirements set out in Appendix 6 of the 2014 Environmental Impact Assessment Regulations, promulgated under Section 24(5) of the National Environmental Management Act (Act No. 107 of 1998) (NEMA). These regulations require that specialist studies assess the potential impact of development activities on palaeontological heritage resources.

South Africa possesses an exceptional palaeontological record that documents critical stages in the history of life on Earth, including early microbial life, the first tetrapods, the evolution of dinosaurs, mammals, and ultimately humans. The country continues to yield important fossil discoveries, reinforcing its global scientific significance and contributing to the understanding of continental evolution, including that of Gondwana.

The protection and conservation of fossil-bearing deposits are therefore essential to ensure that these non-renewable scientific resources remain available for future research, education, and heritage preservation. In terms of the National Heritage Resources Act (Act No. 25 of 1999) (NHRA), fossils and fossil-bearing geological formations are protected heritage resources and may not be disturbed, damaged, or removed without a permit issued by the South African Heritage Resources Agency (SAHRA).

The purpose of the study is to establish whether fossil-bearing geological units are likely to occur beneath the Phase 2 footprint, consider how the proposed excavations could affect such resources, and specify proportionate heritage-management measures.

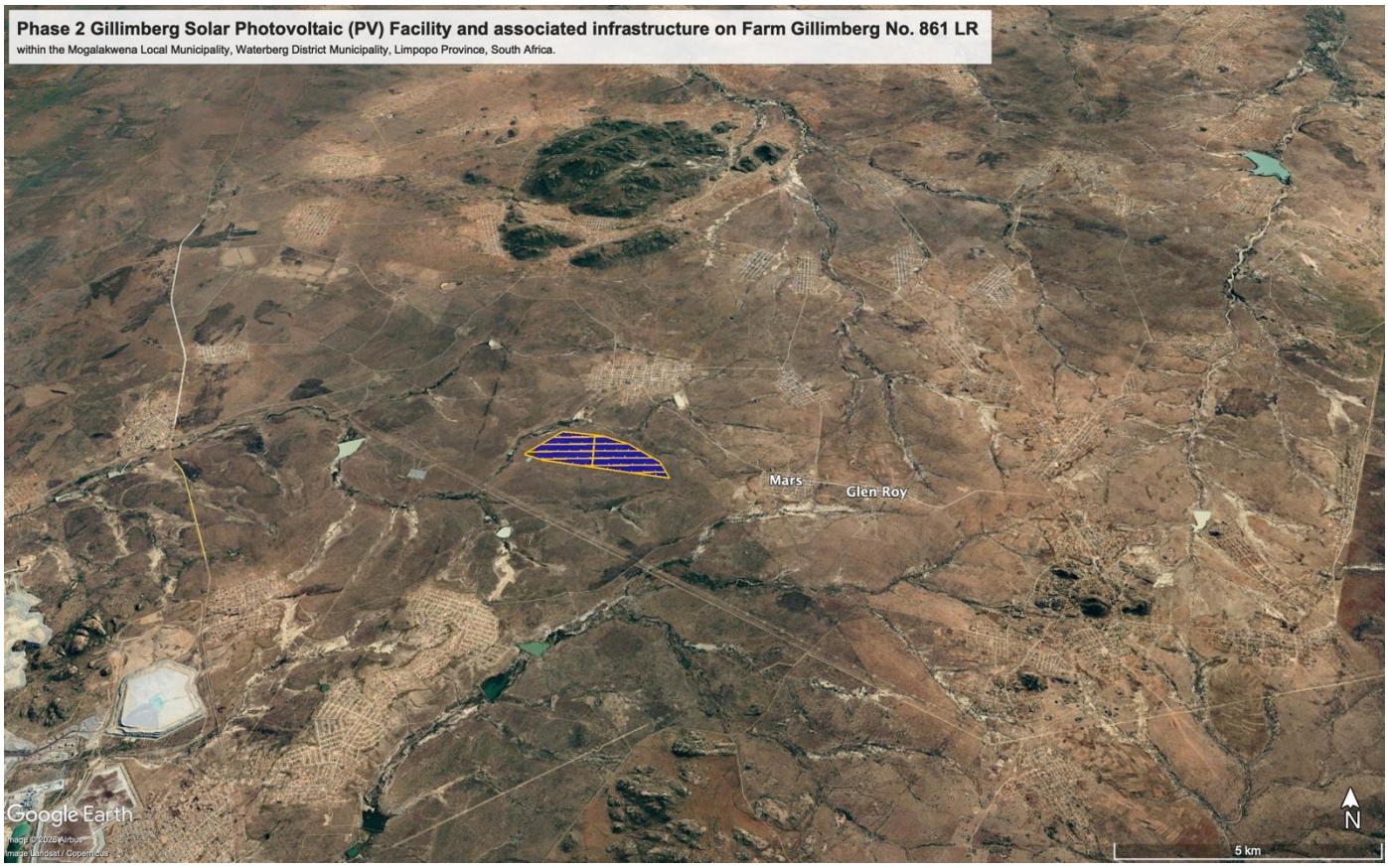


Figure 1. Conceptual layout of the Gillimberg Solar Energy Facility, showing Phase 2 as the northern project portion.

1.1 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 No. 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 No. 107 of 1998
- National Heritage Resources Act (NHRA) Act No. 25 of 1999
- Minerals and Petroleum Resources Development Act (MPRDA) Act No. 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 No. 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 No. 25 of 1999

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

The NEMA (No. 107 of 1998) states that an integrated EMP should (23:2 (b)) "…identify, predict and evaluate the actual and potential impact on the environment, socio-economic conditions and cultural heritage"
In agreement with legislative requirements, EIA rating standards as well as SAHRA policies a comprehensive and legally compatible PIA report has 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 adheres 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 or
  - 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.

2. METHODOLOGY AND TERMS OF REFERENCE

The terms of reference required a desktop appraisal of the northern Phase 2 development area. The work focused on identifying the mapped geological units, determining their fossil-preservation potential, considering the scale and nature of the proposed ground disturbance, and establishing whether field verification or mitigation would be necessary.
The assessment forms the palaeontological component of the Phase 2 heritage assessment and considers both direct excavation impacts and the management of unexpected fossil discoveries. The PIA's goals are to:

1. identify the palaeontological significance of the rock formations in the footprint;
2. evaluate the palaeontological magnitude of the formations;
3. clarify the impact on fossil heritage; and
4. make recommendations for how the developer might protect and minimize potential harm to fossil heritage, according to the "SAHRA APM Guidelines: Minimum

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

Potential impact was evaluated by comparing the fossil potential of each mapped lithology with the expected depth and extent of disturbance from PV foundations, cable trenches, roads, substations and other associated infrastructure.
Sources consulted included regional geological maps, the DFFE Screening Tool, the SAHRIS Palaeosensitivity Map, published geological literature, previous specialist assessments from the surrounding region, available fossil records, satellite imagery and the supplied Phase 2 layout. Because the mapped bedrock has no fossil potential, a broader museum-record search and intrusive field investigation were not considered proportionate to the sensitivity of the site.

3. GEOLOGICAL AND PALAEONTOLOGICAL HISTORY

The Phase 2 footprint lies immediately north of Phase 1 and remains within the same Precambrian crystalline terrain. Regional mapping places the northern site on high-grade metamorphic rocks assigned to the Limpopo Belt and the Hout River Gneiss of its Southern Marginal Zone. The metamorphic history and crystalline character of these rocks exclude meaningful fossil preservation.

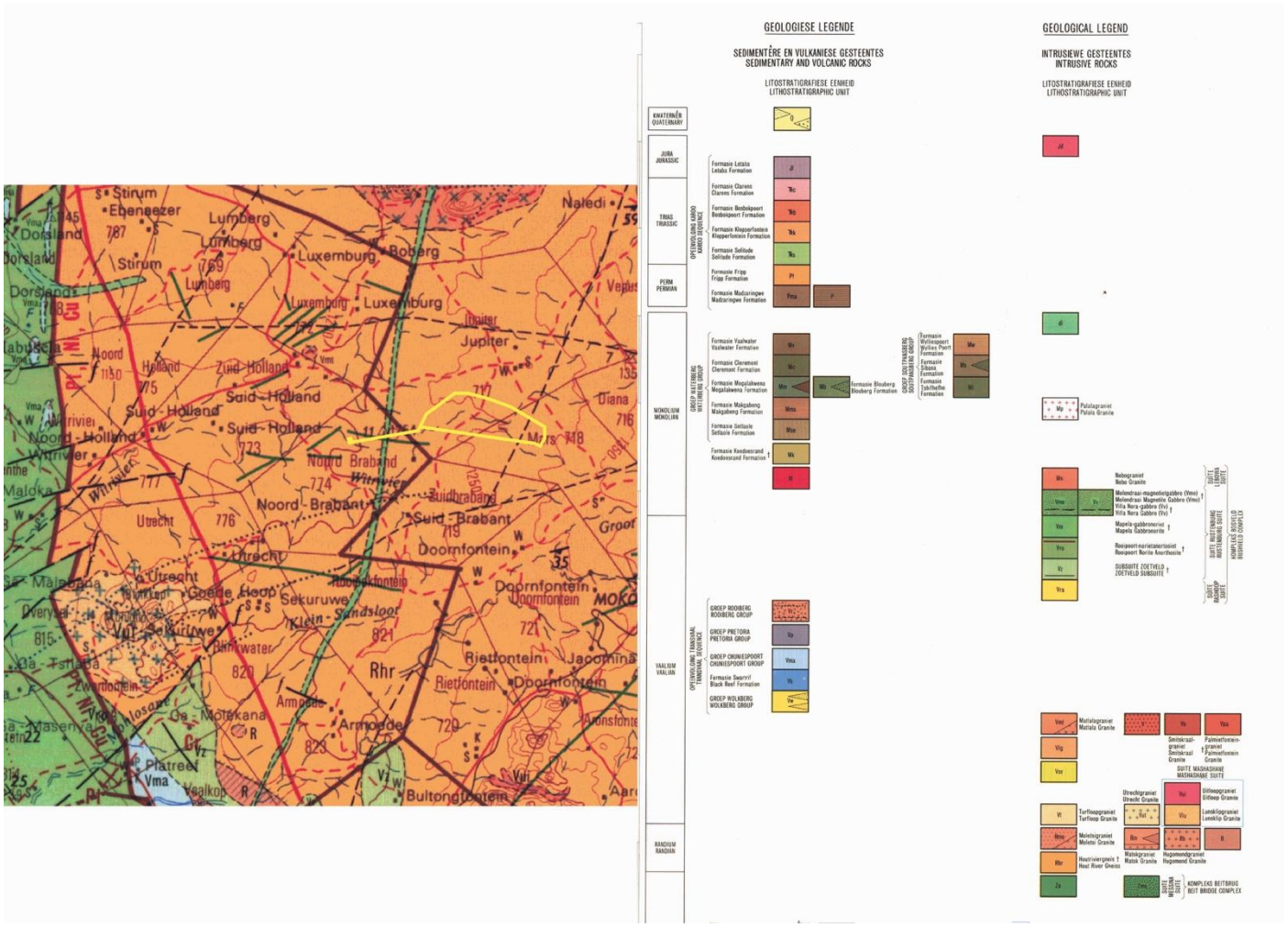


Figure 2. Regional geological setting of the Gillimberg project. The northern Phase 2 footprint is adjacent to Phase 1 and falls within the same mapped Hout River Gneiss terrain shown on Geological Survey 1:250 000 map sheet 2430 Pilgrim's Rest.

3.1. LIMPOPO BELT

The proposed development area is situated within the Limpopo Province of South Africa and is underlain by high-grade metamorphic rocks of the Limpopo Belt. The Limpopo Belt is a Neoarchaean orogenic province that forms a prominent east to west trending tectonic corridor between the Kaapvaal Craton to the south and the Zimbabwe Craton to the north. It extends across northern South Africa into eastern Botswana and southern Zimbabwe. The belt is widely interpreted as the product of late Archaean continental collision and crustal thickening at approximately 2.7 to 2.6 Ga (Van Reenen et al., 1992; Barton and Van Reenen, 1992). It represents one of the classic examples of Archaean craton interaction and preserves deep crustal lithologies that are now exposed at surface as a result of uplift and prolonged erosion. Structurally, the Limpopo Belt is subdivided into three principal tectonic domains, namely the Northern Marginal Zone, the Central Zone, and the Southern Marginal Zone. The marginal zones are generally interpreted as reworked margins of the adjacent cratons, whereas the Central Zone comprises high-grade granulite facies rocks and granitoids that record peak metamorphic conditions and extensive crustal reworking (Van Reenen et al., 1992; Zeh et al., 2004). Geochronological investigations, including U–Pb zircon and Lu–Hf isotope studies, indicate a complex tectonothermal history involving emplacement of tonalite–trondhjemite–granodiorite suites, high-grade metamorphism, partial melting, and prolonged ductile deformation (Zeh et al., 2004; Van Reenen et al., 2011). These processes reflect deep crustal burial during collisional thickening followed by exhumation along major shear zones that accommodated significant lateral displacement. The Limpopo Belt therefore represents deeply exhumed continental crust that records late Archaean tectonic assembly along the southern margin of the Zimbabwe Craton.

3.2. HOUT RIVER GNEISS

The Hout River Gneiss forms part of the Southern Marginal Zone of the Limpopo Belt and is exposed in northern South Africa along the boundary with the Kaapvaal Craton. It represents reworked continental crust associated with late Archaean tectonic interaction between the Kaapvaal and Zimbabwe cratons. Geochronological data indicate that the granitoid protoliths of the Hout River Gneiss are predominantly between approximately 2.7 and 2.6 Ga, with evidence of inheritance from older crustal components (Barton and Van Reenen, 1992; Zeh et al., 2004). The unit records high-grade metamorphism and intense deformation related to crustal thickening and terrane amalgamation during Neoarchaean orogenesis. Lithologically, the Hout River Gneiss consists primarily of tonalitic to granodioritic orthogneiss with subordinate trondhjemitic compositions and local amphibolitic intercalations. The rocks are typically medium to coarse grained and display well-developed gneissic banding defined by alternating quartz and feldspar rich layers and biotite and hornblende rich layers. Mineral assemblages commonly include quartz, plagioclase, biotite and hornblende, with accessory zircon, apatite and titanite, and locally garnet. Metamorphic conditions reached upper amphibolite to granulite facies, consistent with deep crustal metamorphism during late Archaean crustal thickening (Van Reenen et al., 1992; Zeh et al., 2004). Structurally, the unit is strongly foliated and locally mylonitic, particularly along the Hout River Shear Zone, a major ductile structure marking tectonic juxtaposition along the southern margin of the Limpopo Belt. This shear zone accommodated significant displacement during late Archaean deformation associated with craton amalgamation (Van Reenen et al., 2011). The Hout River Gneiss therefore records the emplacement of granitoid protoliths followed by high-grade

metamorphism, partial melting in places, and prolonged ductile deformation during late Archaean continental collision.

4. PALAEONTOLOGY

No palaeontological material is expected within the Phase 2 footprint. The Hout River Gneiss represents metamorphosed and recrystallised continental crust rather than a sedimentary depositional succession. Any primary organic remains would have been destroyed during high-grade metamorphism, and no younger fossil-bearing sedimentary unit is mapped across the northern development area. The desktop search likewise found no recorded fossil occurrence in the immediate vicinity.

5. PALAEONTOLOGICAL SENSITIVITY

For Phase 2, the palaeontological sensitivity assessment is controlled by the mapped bedrock rather than by the position of the footprint within the larger solar development. SAHRIS classifies the underlying Limpopo Belt metamorphic rocks as insignificant to zero sensitivity because they offer no viable conditions for fossil preservation.

The proposed northern footprint contains no mapped fossiliferous sedimentary formation. Consequently, excavation for panels, electrical infrastructure, roads and temporary works is unlikely to intersect palaeontological resources.

The consistency between the geological map, the SAHRIS classification and the adjacent Phase 1 setting provides sufficient confidence for a desktop-level assessment. A targeted palaeontological field survey would not add meaningful information at this sensitivity level.

The assigned insignificant to zero sensitivity is therefore accepted for Phase 2, subject to implementation of a precautionary chance-find procedure during construction.

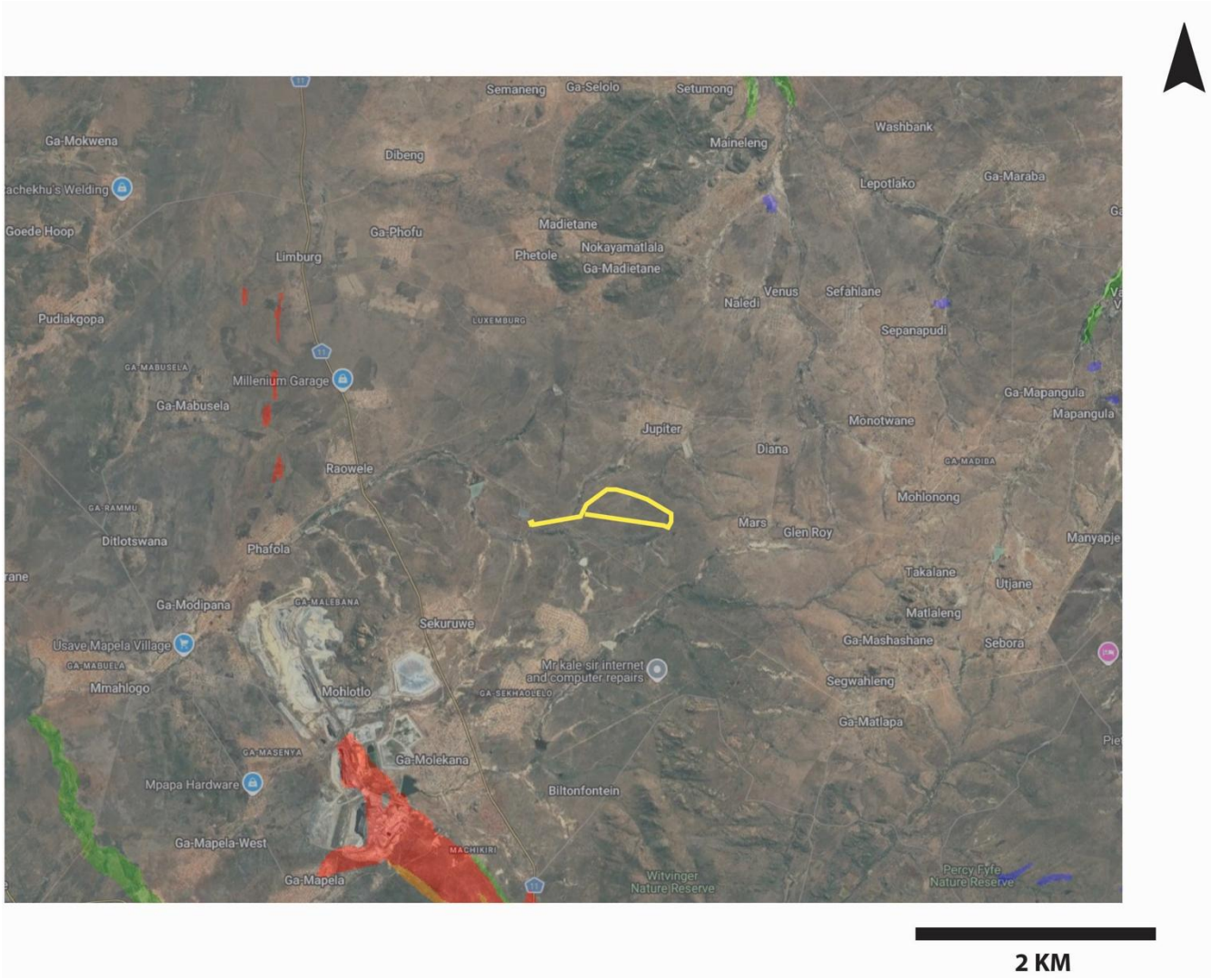


Figure 3. Regional SAHRIS palaeosensitivity context for the Gillimberg development. Phase 2 occupies the adjoining northern portion of the same zero-sensitivity geological terrain.

Table 1. Colour guide for figure 3 of palaeontological sensitivity of South Africa.

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.

6. ASSUMPTIONS AND UNCERTAINTIES

This assessment assumes that the supplied Phase 2 layout accurately identifies the northern development footprint and that the available geological mapping correctly represents the bedrock distribution beneath it. The mapped unit is interpreted as Hout River Gneiss of the Southern Marginal Zone of the Limpopo Belt.

The interpretation further assumes that the mapped metamorphic basement continues beneath shallow soils and weathered material across the Phase 2 site, and that no concealed fossil-bearing sedimentary succession occurs within the expected depth of construction disturbance.

No borehole logs, trial-pit records or detailed subsurface geotechnical results were available for this desktop study. Small patches of transported surface sediment may occur locally, but these would not constitute intact fossil-bearing stratigraphy and are unlikely to contain scientifically important palaeontological material.

These limitations do not materially reduce confidence in the outcome. Phase 2 is contiguous with the independently assessed southern phase, the regional geological framework is well constrained, and all available evidence consistently indicates negligible fossil potential.

7. CONCLUSIONS AND RECOMMENDATIONS

This standalone desktop assessment considered the northern Phase 2 component of the proposed Gillimberg Solar Photovoltaic (PV) Facility and Associated Infrastructure in the Mogalakwena Local Municipality, Waterberg District Municipality, Limpopo Province.

The Phase 2 site is positioned on high-grade metamorphic rocks of the Limpopo Belt, principally the Hout River Gneiss of the Southern Marginal Zone. Their crystalline and strongly recrystallised character prevents fossil preservation. No fossil-bearing formation, documented fossil locality or palaeontological site is known from the northern footprint or its immediate surroundings.

Accordingly, the significance of potential palaeontological impacts is assessed as negligible. No further palaeontological fieldwork or pre-construction mitigation is required for Phase 2.

A Fossil Chance Find Protocol should nevertheless be incorporated into the Phase 2 EMPr as a precaution. If suspected fossil material is exposed, work must stop locally, the find must be

protected and a qualified palaeontologist or SAHRA must be notified before work resumes in the affected area.

With the chance-find procedure in place, Phase 2 of the Gillimberg Solar PV Facility may proceed without palaeontological heritage constraints.

While pre-construction mitigation measures are not required, it is advisable to implement the following recommendations to ensure appropriate heritage management during excavation and construction activities:

- ECO Awareness: The Environmental Compliance Officer responsible for overseeing the project should be informed of the geological context of the site and the extremely low likelihood of encountering palaeontological material.
- Construction Manager Awareness: Construction managers and supervisory personnel should be made aware of the procedures to follow in the unlikely event that fossil material is encountered.
- Exposure Inspection: Any new geological exposures created during excavation for foundations, cable trenches, substations, or access roads should be visually inspected as part of routine environmental monitoring.
- Qualified Palaeontologist Notification: In the unlikely event that fossil material is discovered, work in the immediate vicinity must cease and a qualified palaeontologist or the relevant heritage authority must be contacted for further guidance.
- Recording and Sampling: Any palaeontological material identified as scientifically significant must be recorded and sampled by a qualified specialist. The costs associated with this activity shall be borne by the developer as part of responsible heritage management.

REFERENCES

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Appendix 1: Fossil Chance Finds Procedure

PROCEDURE: CHANCE FINDS OF PALAEONTOLOGICAL MATERIAL

Introduction

This document is aimed to inform workmen and foremen working on a construction and/or mining site. It describes the procedure to follow in instances of accidental discovery of palaeontological material (please see attached poster with descriptions of palaeontological material) during construction/mining activities. This protocol does not apply to resources already identified under an assessment undertaken under s. 38 of the National Heritage Resources Act (no 25 of 1999).

Fossils are rare and irreplaceable. Fossils tell us about the environmental conditions that existed in a specific geographical area millions of years ago. As heritage resources that inform us of the history of a place, fossils are public property that the State is required to manage and conserve on behalf of all the citizens of South Africa. Fossils are therefore protected by the National Heritage Resources Act and are the property of the State. A qualified person should be responsible for the recovery of fossils noticed during construction to ensure that all relevant contextual information is recorded.

Heritage Authorities often rely on workmen and foremen to report finds, and thereby contribute to our knowledge of South Africa's past and contribute to its conservation for future generations.

Training

Workmen and foremen need to be trained in the procedure to follow in instances of accidental discovery of fossil material, in a similar way to the Health and Safety protocol. A brief introduction to the process to follow in the event of possible accidental discovery of fossils should be conducted by the designated Environmental Control Officer (ECO) for the project, or the foreman or site agent in the absence of the ECO. It is recommended that copies of the attached poster and procedure are printed out and displayed at the site office so that workmen may familiarise themselves with them and are thereby prepared if accidental discovery of fossil material takes place.

Actions to be taken

One person in the staff must be identified and appointed as responsible for the implementation of the attached protocol in instances of accidental fossil discovery and must report to the ECO or site agent. If the ECO or site agent is not present on site, then the responsible person on site should follow the protocol correctly to not jeopardize the conservation and well-being of the fossil material.

Once a workman notices possible fossil material, he/she should report this to the ECO or site agent.

Procedure to follow if it is likely that the material identified is a fossil:

1. The ECO or site agent must ensure that all work ceases immediately in the vicinity of the area where the fossil or fossils have been found;
2. The ECO or site agent must inform SAHRA of the find immediately. This information must include photographs of the findings and GPS co-ordinates;
3. The ECO or site agent must compile a Preliminary Report and fill in the Fossil Discoveries: SAHRA Preliminary Record Form within 24 hours without removing the

fossil from its original position. The Preliminary Report records basic information about the find including:

- The date
- A description of the discovery
- A description of the fossil and its context (e.g. position and depth of find) Where and how the find has been stored
- Photographs to accompany the preliminary report (the more the better):
  - A scale must be used
  - Photos of location from several angles Photos of vertical section should be provided
  - Digital images of hole showing vertical section (side);
  - Digital images of fossil or fossils.

4. Upon receipt of this Preliminary Report, SAHRA will inform the ECO or site agent whether or not a rescue excavation or rescue collection by a palaeontologist is necessary.

5. Exposed finds must be stabilized where they are unstable and the site capped, e.g. with a plastic sheet or sandbags. This protection should allow for the later excavation of the finds with due scientific care and diligence. SAHRA can advise on the most appropriate method for stabilization.

6. If the find cannot be stabilized, the fossil may be collect with extreme care by the ECO or the site agent and put aside and protected until SAHRA advises on further action. Finds collected in this way must be safely and securely stored in tissue paper and an appropriate box. Care must be taken to remove the fossil material and any breakage of fossil material must be avoided at all costs.

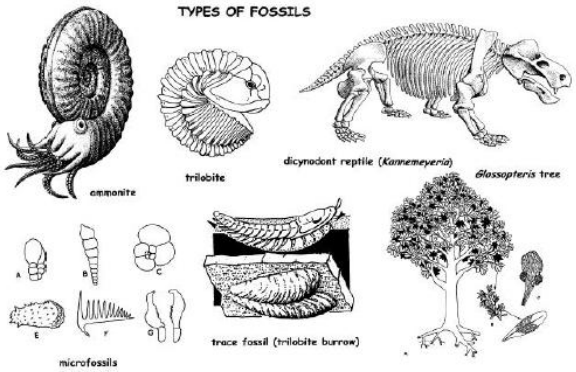
No work may continue in the vicinity of the find until SAHRA has indicated, in writing, that it is appropriate to proceed.

FOSSIL DISCOVERIES: SAHRA PRELIMINARY RECORDING FORM			
Name of project	Gillimberg Solar PV Facility and Associated Infrastructure - Phase 2		
Name of fossil location			
Date of discovery			
Description of situation in which the fossil was found:			
Description of context in which the fossil was found:			
Description and condition of fossil identified:			
GPS coordinates:	Lat:	Long:	
If no co-ordinates available then please describe the location:			
Time of discovery:			
Depth of find in hole:			
Photographs (tick as appropriate and indicate number of the photograph)	Digital image of vertical section (side)		
	Fossil from different angles		
	Wider context of the find		
Temporary storage (where it is located and how it is conserved)			
Person identifying the fossil	Name: Contact:		
Recorder:	Name: Contact:		
Photographer	Name: Contact:		

Palaeontology: what is a fossil?

Fossils are the traces of ancient life (animal, plant or microbial) preserved within rocks and come in two forms:

- Body fossils preserve parts, casts or impressions of the original tissues of an organism (e.g. bones, teeth, wood, pollen grains); and
- Trace fossils such as trackways and burrows record ancient animal behaviour.



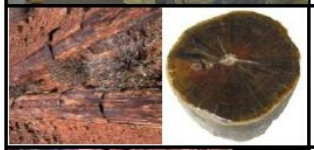
How to report chance fossil finds: What should I do if I find a fossil during construction/mining?

If you think you have identified a fossil:

Types of palaeontological finding - What does a fossil look like?

Fossils vary in size, from fossilised tree trunks and dinosaur bones down to very small animals or plants. Finds can be **individual fossils** (one isolated wood log or bone) or **clusters and beds** (several bones, teeth, animal or plant remains, trace fossils in close proximity or bones resembling part of a skeleton). A bed of fossils is a layer with many fossil remains.

Below there is a list of few examples of fossils which may be identified during excavations in the Western Cape.

Image	Description	Image	Description
	Leaves		Snail shells and other shells
	Fossil wood		Bones of larger animals
	The remains of fish and marine life (e.g. teeth, scales, starfish)		Large burrows made by moles and other animals