

HERITAGE SCOPING REPORT

For the proposed Vanderkloof Solar PV and BESS Projects, Free State Province

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Cape EAPrac

Applicant:
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EXECUTIVE SUMMARY

Vanderkloof Solar (Pty) Ltd proposes the development of cluster of PV and BESS projects on the Remainder of farm 113, Remainder of Farm 634, Farm 39, Remainder of Farm 253, Remainder of Farm 1132, Portion 1 of Farm 1132 and Farm 654 in the Letsemeng Local Municipality in the Xhariep District of the Free State Province. Beyond Heritage was appointed to assess the potential impacts to heritage resources by the Project. This report is for the scoping phase of the Project and is based on a desktop study that provides a brief review of the local heritage and potential sites to be avoided. Key findings include:

- The larger region around Luckhoff is characterised by Stone Age sites (especially Middle and Later Stone Age) and Historical sites. A background scatter of MSA artefacts can be expected in this region;
- Watercourses and dolerite outcrops are of particular sensitivity in relation to significant Stone Age sites;
- A National Monument, the Old Powder Magazine is situated north of the Project area within Luckhoff and was declared a Provincial Heritage site in 1984;
- The study area is indicated to be of insignificant, moderate, and high palaeontological sensitivity according to SAHRIS, and additional studies are required for the EIA phase;
- To comply with the National Heritage Resources Act, 1999 (Act No. 25 of 1999) (NHRA) and with cognisance of known heritage resources in the area, the development footprint should be subjected to a field-based Heritage Impact Assessment (HIA) of the final impact areas.

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ABBREVIATIONS

AIA: Archaeological Impact Assessment
ASAPA: Association of South African Professional Archaeologists
BIA: Basic Impact Assessment
CRM: Cultural Resource Management
ECO: Environmental Control Officer
EIA: Environmental Impact Assessment*
EIA: Early Iron Age*
EIA Practitioner: Environmental Impact Assessment Practitioner
EMPr: Environmental Management Programme
ESA: Early Stone Age
GPS: Global Positioning System
HIA: Heritage Impact Assessment
LIA: Late Iron Age
LSA: Late Stone Age
MEC: Member of the Executive Council
MIA: Middle Iron Age
MPRDA: Mineral and Petroleum Resources Development Act
MSA: Middle Stone Age
NEMA: National Environmental Management Act
PRHA: Provincial Heritage Resource Agency
SADC: Southern African Development Community
SAHRA: South African Heritage Resources Agency
UNESCO: The United Nations Educational, Scientific and Cultural Organization
WEF: Wind Energy Facility

**Although EIA refers to both Environmental Impact Assessment and the Early Iron Age, both are internationally accepted abbreviations and must be read and interpreted in the context it is used.*

GLOSSARY

Archaeological site (remains of human activity over 100 years old)

Earlier Stone Age (2 million to 300 000 years ago)

Middle Stone Age (300 000 to 30 000 years ago)

Later Stone Age (30 000 years ago until recent)

Historic (approximately AD 1840 to 1950)

Historic building (over 60 years old)

Lithics: Stone Age artefacts

1. INTRODUCTION

Beyond Heritage was contracted by CAPE EAPrac to conduct a heritage scoping study for the cluster of PV and BESS projects on the Remainder of farm 113, Remainder of Farm 634, Farm 39, Remainder of Farm 253, Remainder of Farm 1132, Portion 1 of Farm 1132 and Farm 654 in the Letsemeng Local Municipality in the Xhariep District of the Free State Province (Figure 1.1 – 1.2).

The report outlines the approach and methodology utilised for the scoping phase of the Project. Possible impacts are identified, as well as potential risks to the Project.

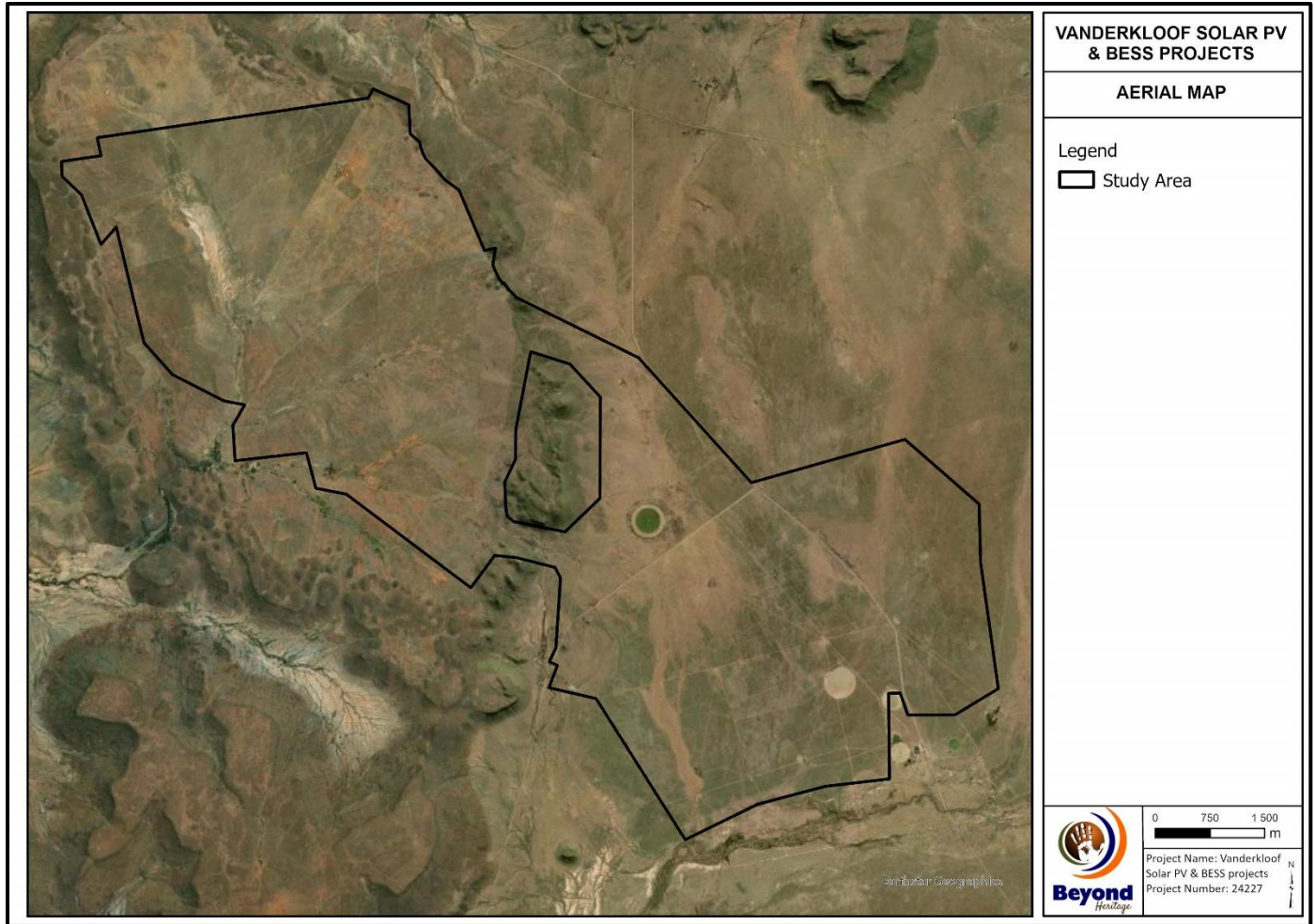


Figure 1.2. Aerial view of the study area.

1.1 Terms of Reference

The main aim of this scoping report is to determine if any known heritage resources occur within the study area and to predict the occurrence of any possible heritage significant sites that might present a fatal flaw to the proposed project. The objectives of the scoping report were to:

- » Conduct a desktop study:
 - * Review available literature, previous heritage studies and other relevant information sources to obtain a thorough understanding of the archaeological and cultural heritage conditions of the area;
 - * Gather data and compile a background history of the area;
 - * Determine whether the area is renowned for any cultural and heritage resources, such as Stone Age sites, Iron Age sites, informal graveyards or historical homesteads.

- » Report

The reporting of the scoping component is based on the results and findings of the desktop study, wherein potential issues associated with the proposed project will be identified, and those issues requiring further investigation through the Impact Assessment (IA) Phase highlighted. Reporting will aim to identify the potential impacts of the proposed project activity on heritage resources. Reporting will also consider alternatives should any significant sites be impacted on by the proposed project. This is done to assist the developer in managing heritage resources in a responsible manner, in order to protect, preserve and develop them within the framework provided by Heritage Legislation.

1.2 Nature of the development

1.2.1. Project Details (as provided)

The development will consist of 5 PV and 5 BESS sites (configuration to be determined in the EIA Phase) consisting of solar photovoltaic (PV) technology, fixed-tilt-, single-axis tracking- or dual-axis tracking- mounting structures, with a net generating capacity of 2000 MWac as well as associated infrastructure, which will include:

- On-site switching-station / substation;
- Auxiliary buildings (gatehouse and security, control centre, office, warehouse, canteen & visitors centre, staff lockers etc.);
- Inverter-stations, transformers and internal electrical reticulation (underground cabling);
- Access and internal road network;
- Laydown area;
- Battery Energy Storage Systems
- Rainwater tanks; and
- Perimeter fencing and security infrastructure

The proposed Solar PV developments will connect from the onsite sub-stations to the Proposed Eskom Luckhoff MTS, this basic assessment process only includes the IPP portion of the onsite sub-stations, while the remainder of the grid connection is being assessed in a separate BAR process.

1.3 The receiving environment

The study area is rural in character and sparsely developed. Farmsteads/homesteads and agricultural fields are found scattered throughout the Vanderkloof Solar PV development area. Infrastructure includes fences and access roads associated with the farming activities in the study area. Powerlines also traverse the Project area. A large area with a catchment area is situated within the western section of the Project area and gets flatter with small, scattered hills across the eastern section.

2. APPROACH AND METHODOLOGY

The assessment is to be undertaken in two phases, a scoping phase and a Heritage Impact Assessment (HIA) phase, as part of the EIA process, this report concerns the scoping phase. The aim of the scoping phase is to assess the study area at a desktop level to compile a background history of the study area, to identify possible heritage issues or fatal flaws that should be avoided during development.

This was accomplished by means of the following phases (the results are represented in section 7 of this report):

2.1 Literature search

A literature search was conducted utilising data from published articles on the archaeology and history of the area. The aim of this is to extract data and information on the area in question, looking at archaeological sites, historical sites and graves of the area.

2.2 Information collection

South African Heritage Resources Information System (SAHRIS) was consulted to collect data from Cultural Resource Management (CRM) practitioners who undertook work in the area to provide the most comprehensive account of the history of the area where possible.

2.3 Public consultation

A full public consultation process will be facilitated by the Environmental Assessment Practitioner (EAP). Any heritage concerns raised during this process will be addressed in the HIA.

2.4 Google Earth and mapping survey

Google Earth and 1:50 000 maps of the area were utilised to identify possible places where archaeological sites might be located.

2.5 Genealogical Society of South Africa (GSSA)

The database of the genealogical society was consulted to collect data on any known graves in the area.

3. LEGISLATION

For this project, the National Heritage Resources Act, 1999 (Act No. 25 of 1999) (NHRA) is of importance and the following sites and features are protected:

- a. Archaeological artefacts, structures and sites older than 100 years.
- b. Ethnographic art objects (e.g. prehistoric rock art) and ethnography.
- c. Objects of decorative and visual arts.
- d. Military objects, structures and sites older than 75 years.
- e. Historical objects, structures and sites older than 60 years.
- f. Proclaimed heritage sites.
- g. Grave yards and graves older than 60 years.
- h. Meteorites and fossils.
- i. Objects, structures and sites of scientific or technological value.

The national estate includes the following:

- a. Places, buildings, structures and equipment of cultural significance.
- b. Places to which oral traditions are attached or which are associated with living heritage.
- c. Historical settlements and townscapes.
- d. Landscapes and features of cultural significance.
- e. Geological sites of scientific or cultural importance.
- f. Archaeological and palaeontological importance.
- g. Graves and burial grounds.
- h. Sites of significance relating to the history of slavery.
- i. Movable objects (e.g. archaeological, palaeontological, meteorites, geological specimens, military, ethnographic, books etc.).

Section 34 (1) of the act deals with structures which is older than 60 years. Section 35(4) of this act deals with archaeology, palaeontology and meteorites. Section 36(3) of the NHRA deals with human remains older than 60 years. Unidentified/unknown graves are also handled as older than 60 until proven otherwise.

3.1 Heritage Site Significance and Mitigation Measures

The presence and distribution of heritage resources define a Heritage Landscape. In this landscape, every site is relevant. In addition, because heritage resources are non-renewable, heritage surveys need to investigate an entire project area. In all initial investigations, however, the specialists are responsible only for the identification of resources visible on the surface.

This section describes the evaluation criteria used for determining the significance of archaeological and heritage sites. National and Provincial Monuments are recognised for conservation purposes. The following interrelated criteria were used to establish site significance:

- » The unique nature of a site;
- » The integrity of the archaeological/cultural heritage deposit;
- » The wider historic, archaeological and geographic context of the site;
- » The location of the site in relation to other similar sites or features;
- » The depth of the archaeological deposit (when it can be determined or is known);
- » The preservation condition of the site; and
- » Potential to answer present research questions.

The criteria above will be used to place identified sites within SAHRA's (2006) system of grading of places and objects which form part of the national estate (Table 4). This system is approved by the Association of South African Professional Archaeologists (ASAPA) for the Southern African Development Community (SADC) region.

Table 1. Heritage significance and field ratings

FIELD RATING	GRADE	SIGNIFICANCE	RECOMMENDED MITIGATION
National Significance (NS)	Grade 1	-	Conservation; national site nomination
Provincial Significance (PS)	Grade 2	-	Conservation; provincial site nomination
Local Significance (LS)	Grade 3A	High significance	Conservation; mitigation not advised
Local Significance (LS)	Grade 3B	High significance	Mitigation (part of site should be retained)
Generally Protected A (GP. A)	-	High/medium significance	Mitigation before destruction
Generally Protected B (GP. B)	-	Medium significance	Recording before destruction
Generally Protected C (GP.C)	-	Low significance	Destruction

4.

5. REGIONAL OVERVIEW

4.1 General Information

4.1.1. Literature search

The reports indicated in Table 2 were conducted in the greater study area and were consulted for this report:

Table 2. Heritage reports conducted in the greater study area.

Author	Year	Project	Findings
Rossouw, L.	2018	Phase 1 Heritage Impact Assessment of a Proposed New Landfill Site in Luckhoff, Free State Province.	Stone Age knapping site.
Rossouw, L.	2021	Phase 1 Heritage Impact Assessment of a proposed new Waste Disposal Site in Luckhoff, Free State Province.	No sites were identified.
Dreyer, C.	2006	First Phase Archaeological and Cultural Heritage Investigation of the Proposed Residential Developments at Luckhoff, Free State.	Modern structure remains.
Van Schalkwyk, J.A.	2015	Cultural Heritage Impact Assessment for the proposed Grootpoort Photovoltaic Solar Energy Development Facility near Luckhoff, Letsemeng Local Municipality, Free State Province.	MSA scatters.
Van Schalkwyk, J.A.	2022a	Phase 1 Cultural Heritage Impact Assessment: The Development of the Luckhoff Solar 1 Photovoltaic Solar Energy Facility, Near Luckhoff, Free State Province.	No sites were identified.
Van Schalkwyk, J.A.	2022b	Phase 1 Cultural Heritage Impact Assessment: The Development of the Luckhoff Solar 2 Photovoltaic Solar Energy Facility, Near Luckhoff, Free State Province.	No sites were identified.
Lavin, J.	2022	Heritage Impact Assessment In terms of Section 38(8) of the NHRA for the Xhariep Export Programme (XEP) Agricultural Development and associated infrastructure near Luckhoff, Free State Province.	Graves, Historical Havenga bridge, multiple MSA and LSA scatters.
Lavin, J.	2023a	Heritage Impact Assessment In terms of Section 38(8) of the NHRA for the Proposed development of Luckhoff 4 SEF in the Free State Province.	Hornfels flakes and points on top of small koppie, a single grave, both are situated outside the Project area.
Lavin, J.	2023b	Heritage Impact Assessment In terms of Section 38(8) of the NHRA for the Proposed development of Luckhoff 5 SEF in the Free State Province.	No sites were identified.
Mlilo, T.	2023	Phase 1 Archaeological and Heritage Impact Assessment Report for the Proposed Mining Permit Application on Portion Plaas Dundee Nr 416, Fauresmith in the Letsemeng Local Municipality, Free State Province.	No sites were identified.

4.1 2. Public consultation

A public participation process is facilitated by the EAP and potential heritage concerns raised will be included in the HIA report.

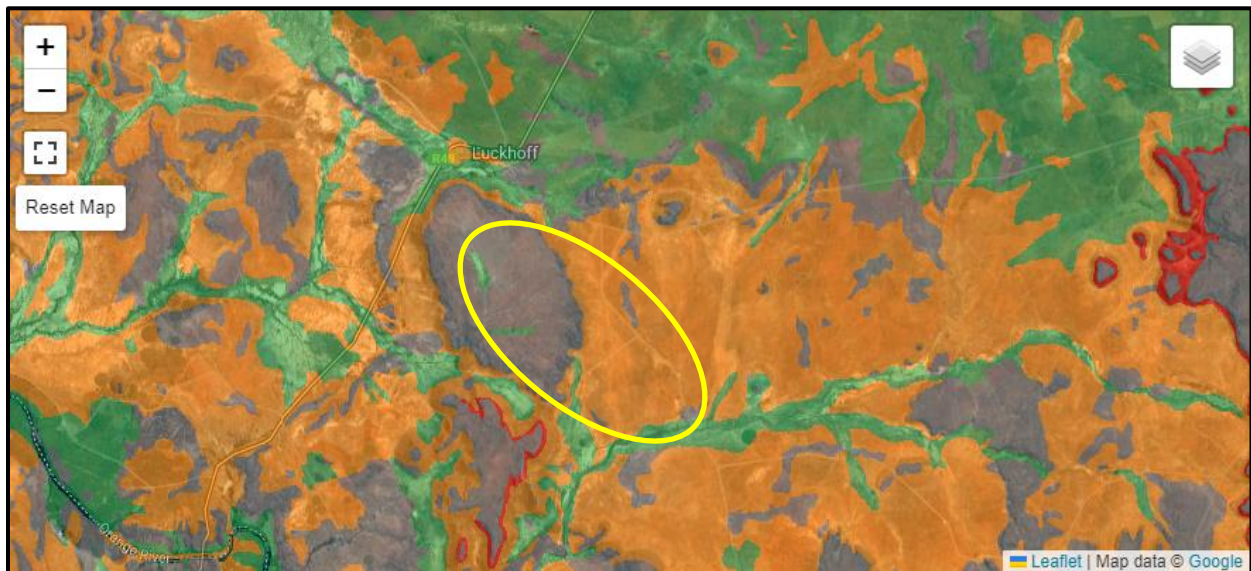
4.1.3. Google Earth and mapping survey

Google Earth and 1:50 000 maps of the area was utilised to identify possible places where archaeological sites might be located.

4.2. Palaeontology

The study area is of insignificant, moderate, and high palaeontological sensitivity (Figure 4.1) and further studies will be required in the EIA phase.

An independent study will have to be conducted for this project in the IA phase.



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.

Figure 5.1. Palaeontological sensitivity map of the approximate study areas (yellow polygon).

5.3. Archaeology of the greater study area

The archaeological record for the greater study area consists of the Stone Age, Iron Age and Historical Period.

4.3.1. Stone Age

South Africa has a long and complex Stone Age sequence of more than 2 million years. The broad sequence includes the Later Stone Age, the Middle Stone Age and the Earlier Stone Age. Each of these phases contains sub-phases or industrial complexes, and within these we can expect regional variation regarding characteristics and time ranges. For (CRM) purposes it is often only expected/ possible to identify the presence of the three main phases. Yet sometimes the recognition of cultural groups, affinities or trends in technology and/or subsistence practices, as represented by the sub-phases or industrial complexes, is achievable. The three main phases can be divided as follows;

- » Later Stone Age (LSA); associated with Khoi and San societies and their immediate predecessors. - Recently to ~30 thousand years ago.
- » Middle Stone Age (MSA); associated with Homo sapiens and archaic modern human - . 30-300 thousand years ago.
- » Earlier Stone Age (ESA); associated with early Homo groups such as Homo habilis and Homo erectus. - 400 000-> 2 million years ago.

Stone Age archaeological sites in the region are typically associated with river courses and areas where dolerite outcrops occur, particularly near Goemmansberg and Troostenberg (Rossouw 2018). Dolerite outcrops are significant as Stone Age artifacts in the area are mainly made of hornfels, a rock found in the contact zone between dolerites and shales. Consequently, stone tool knapping sites are commonly found near dolerite-shale contact zones. An instance of an MSA knapping site was recorded approximately 2.5km north of the Project area on the outskirts of Luckhoff (Rossouw 2018).

The Orange River and its tributaries are renowned for their river gravels, which contain significant amounts of Early Stone Age tools, such as Acheulean artifacts (Sampson 1972). Additionally, the region has yielded the Fauresmith industry, identified by Van Riet Lowe, which represents a transitional phase between the ESA and MSA. The Fauresmith industry exhibits technological and typological elements of the MSA, including smaller tools and distinctive hand-axes. Assemblages feature refined hand-axes, long blades, convergent flakes/points, scrapers, and prepared cores. Overbank deposits and alluvial terraces along the Riet River north of Luckhoff have also yielded Middle and Later Stone Age open sites and LSA rock engravings. Additionally, rock engravings on dolerite are prevalent in the region, with recordings documented on several farms between Koffiefontein and Luckhoff. Numerous rock engraving sites particularly on the eastern side of the Riet River have also been identified. Some engravings depict people riding horses. Many of these engravings have been relocated and are on display in the town of Koffiefontein.

4.3.2. Iron Age

Bantu-speaking people moved into Eastern and Southern Africa about 2 000 years ago (Mitchell 2002). These people cultivated sorghum and millets, herded cattle and small stock and manufactured iron tools and copper ornaments. Because metalworking represents a new technology, archaeologists call this period the Iron Age. Characteristic ceramic styles help archaeologists to separate the sites into different groups and time periods. The Iron Age as a whole represents the spread of Bantu speaking people and includes both the Pre-Historic and Historic periods. It can be divided into three distinct periods:

- » The Early Iron Age (EIA): Most of the first millennium AD.
- » The Middle Iron Age (MIA): 10th to 13th centuries AD.

- » The Late Iron Age (LSA): 14th century to colonial period.

The Project area is situated further south of the site distribution pattern of Type R settlement sites first described by William Burchell and then later defined by Maggs (1971). Type R settlement sites were seen to have been localised to the area surrounding the Riet River. These sites are different to other Free State Iron Age sites in that Type R sites are situated closer to the river with sites being recorded within 1 km from the river (Maggs 1971). This settlement type also seems to have favoured the base of hills which were noted to be not much higher than the riverbank rather than on top of hills. Type R sites also showed preference to dolerite outcrops.

The Type R settlement units typically consist of one large central enclosure surrounded by several smaller enclosures arranged in a loose manner. The central enclosures range from approximately 20 to 70 meters in diameter and likely functioned as kraals. The smaller enclosures are typically less than 14 meters in diameter. Each settlement unit contains an average of about 5 small enclosures, with their entrances, when identifiable, facing inward toward the central enclosure. While some of these smaller enclosures may have been used for domestic activities, archaeological excavations have generally not yielded significant finds, leaving the interpretation of their purpose unclear (Maggs 1967). These sites mark a transitional period between the settlement of Khoi herders, who established permanent residences, and the arrival of Iron Age Tswana-speaking people in the region. Iron Age sites are not expected within the Project area.

4.3.3. Historical context of Luckhoff

The town of Luckhoff was established on the farm Koffiekuil in 1892 (Raper 2004). The town was named after Heinrich Jacob Luckhoff who was the Minister of the Dutch Reformed Church in Fauresmith at the time. During the Anglo-Boer War the town faced large damages which were only restored in the 1900s.

The old Powder Magazine which is situated on a portion of the Remainder of Townlands of Luckhoff 57, was declared as a Provincial Heritage site in 1984 and given the status of National Monument.

4.3.5. Graves and Burial sites

No known cemeteries are situated in the study area. The Luckhoff Cemetery is situated about 2,5km north of the Project area within the town of Luckhoff.

4.3.6. Cultural Landscape

The area is largely undeveloped and has areas which are cultivated and part of farmlands. Development in the study area is limited to farming infrastructure such as access roads, farmsteads, structures, as well as powerlines.

6. PROBABILITY OF OCCURRENCE OF SITES

Based on the above information, it is possible to determine the probability of finding archaeological and cultural heritage sites within the study area to a certain degree. For the purposes of this section of the report, the following terms are used – low, medium and high probability. Low indicates that no known occurrences of sites have been found previously in the general study area. Medium probability indicates some known occurrences in the general study area are documented and can therefore be expected in the study area. High probability indicates that occurrences have been documented close to or in the study area and that the environment of the study area has a high degree of probability having sites.

» Palaeontological landscape

Fossil remains. *Medium probability.*

» Archaeological And Cultural Heritage Landscape

NOTE: *Archaeology is the study of human material and remains (by definition) and is not restricted in any formal way as being below the ground surface.*

Archaeological remains dating to the following periods can be expected within the study area:

» **Stone Age finds**

ESA: *Medium Probability*
 MSA: *Medium to High Probability*
 LSA: *Medium to High Probability*
 LSA –Herder: *Low Probability*
 Rock Art Sites – *Medium to high Probability*

» **Iron Age finds**

EIA: *Low Probability*
 MIA: *Low Probability*
 LIA: *Low Probability*

» **Historical finds**

Historical period: *Medium to High Probability*
 Historical dumps: *Medium Probability*
 Structural remains: *Medium to High Probability*
 Cultural Landscape: *Medium probability*

» **Living Heritage**

For example, rainmaking sites: *Low Probability*

» **Burial/Cemeteries**

Burials over 100 years: *Medium Probability*
 Burials older than 60 years: *Medium Probability*

Subsurface excavations including ground levelling, landscaping, and foundation preparation can expose any number of these.

7. ASSUMPTIONS AND LIMITATIONS

The study area was not subjected to a field survey as this will be conducted in the EIA phase. It is assumed that information obtained for the wider area is applicable to the study area and the authors acknowledge that the brief literature review is not exhaustive on the literature of the area. Due to the subsurface nature of cultural deposits, the possibility exists that some features or artefacts may not have been published. Similarly, the possible occurrence of graves and other cultural material cannot be excluded. This study did not assess the impact on medicinal plants and intangible heritage as it is assumed that these components would be highlighted through the public consultation process if relevant. It is possible that new information could come to light in future, which might change the results of this scoping report.

8. FINDINGS

Based on areal imagery and a desktop assessment the study area includes heritage sensitive areas that specifically relate to Stone Age and Historical occupation of the Project area and potential associated Historical burial sites (Figure 7.1). Based on the distribution of such sites on the landscape additionally sensitive areas were noted and indicated on Figure 7.2 as areas of heritage potential. These areas are derived from predictive modelling based on human behavioural ecology (HBE) theory but need to be ground truthed. These areas of sensitivity include rocky outcrops, hills, and watercourses. An area with hills and koppies has been excluded from the Project footprint which may have been sensitive to Stone Age finds. The large drainage lines present in the western section of the footprint may be of heritage sensitivity. Features visible on areal imagery were overlain on the map showing possible sensitivities.

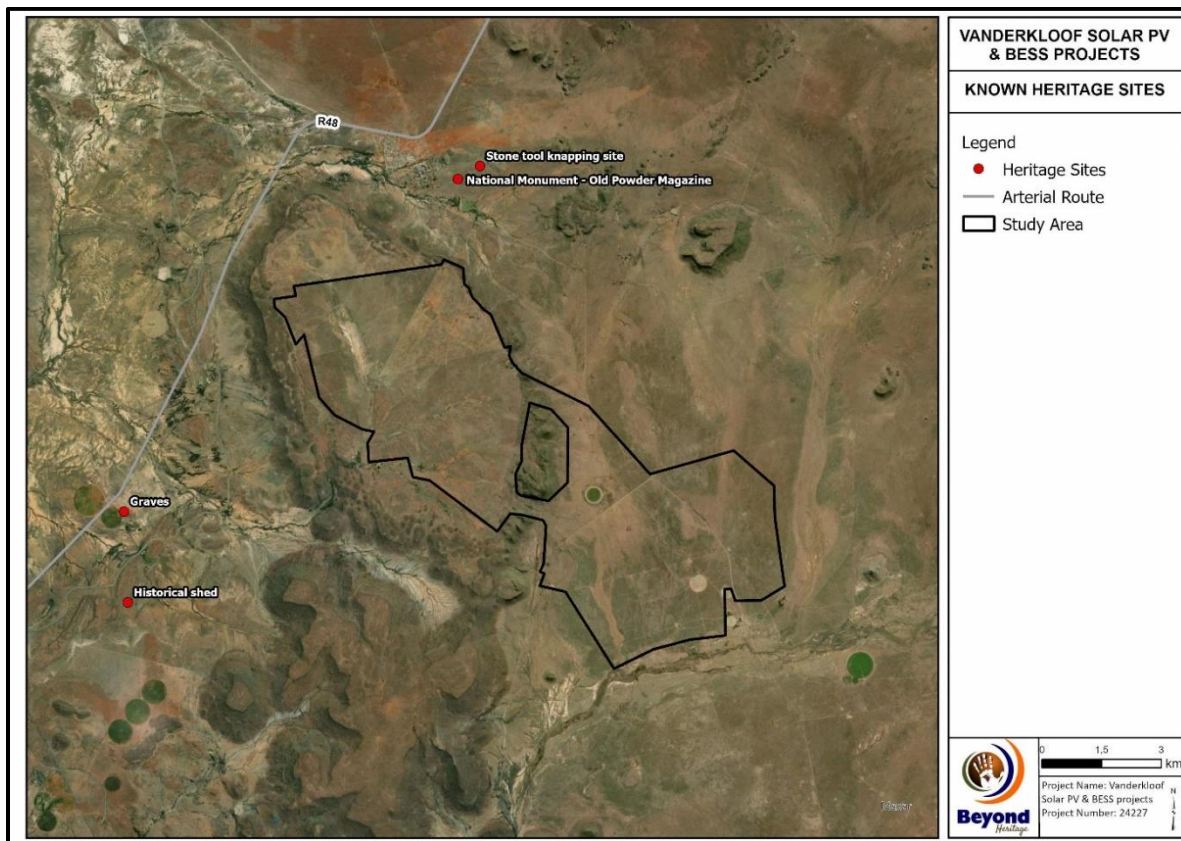


Figure 8.1. Known sites in relation to the study area.

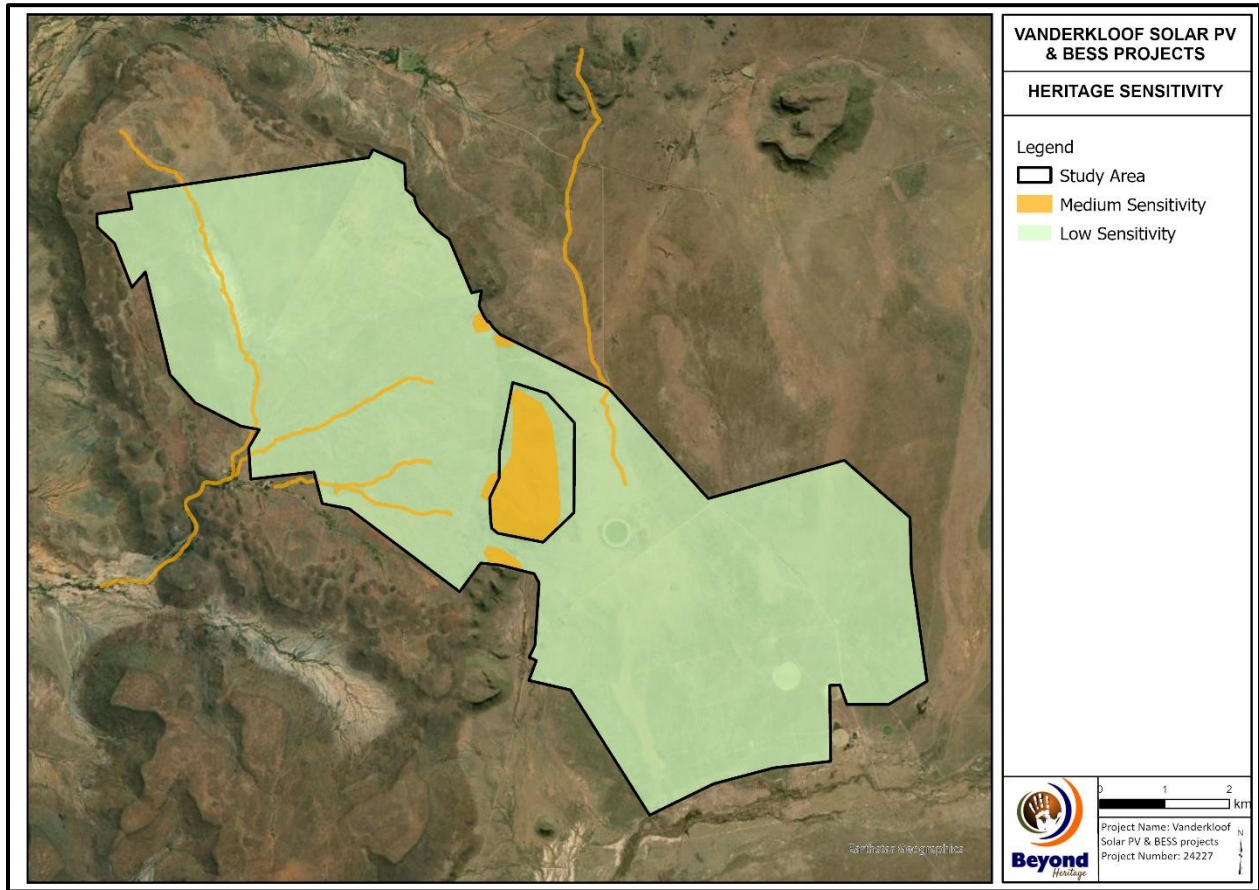


Figure 8.2. Map showing areas of heritage potential and possible heritage sensitivities in the Project Area.

9. POTENTIAL SIGNIFICANCE OF HERITAGE RESOURCES

Based on the current information obtained for the area at a desktop level, it is anticipated that apart from the burial sites, any other heritage resources that occur within the development areas could have a Generally Protected B (GP. B) or lower field rating and should be mitigatable. Graves are of high social significance (Field rating GP A) and should preferably be preserved *in situ*.

10. CONCLUSION AND PLAN OF STUDY FOR EIA

The area has shown human occupation spanning from the Early Stone Age with emphasis on Middle and Later Stone Age finds closer to the Project area including a MSA knapping site of medium significance approximately 2,5km north of the Project area (Rossouw 2018). Significant Stone Age sites are protected by Section 35 of the NHRA. A Provincial Heritage site is also situated north of the Project area within the town of Luckhoff which consists of an old Powder Magazine which has been declared a National Monument. The Project area and the surrounding area was also historically inhabited and heritage resources such as structures (including farmsteads/ruins and associated burial sites) and associated landscape elements older than 60 years are of importance and are protected by Section 34 & 36 of the NHRA.

To comply with the NHRA and with cognisance of known heritage resources in the area, it is recommended that the final footprint should be subjected to a HIA. During this study, the potential impact on heritage resources will be determined as well as levels of significance of recorded heritage resources. The HIA should also provide management and mitigation measures, ensuring that all the requirements of the SAHRA are met. In order to compile an integrated HIA, the following requirements apply:

- The study area is of insignificant, moderate, and high paleontological sensitivity and additional studies are required for the EIA phase;
- The visual impact of the PV solar facility on the farmsteads that are older than 60 years and archaeological sites should be assessed by the Visual Specialist considering the sense of place and impact on the cultural landscape;
- During the public participation and stakeholder consultation process facilitated by the EAP, advertisements & site notices must reference the NHRA and address heritage concerns from stakeholders.

11. LIST OF PREPARERS


Lara Kraljević (Archaeologist)

11. STATEMENT OF COMPETENCY

The author of the report completed her masters in archaeology at the University of Pretoria specialising in chemical and mineralogical studies of Iron Age ceramics. Lara is an accredited member of the Association of South African Professional Archaeologists (ASAPA) (#661). She has co-authored over 100 impact assessments in Gauteng, Limpopo, Mpumalanga, Northern Cape, Eastern Cape, and North West Provinces in South Africa.

12. STATEMENT OF INDEPENDENCE

I, Lara Kraljević as duly authorised representative of Beyond Heritage, hereby confirm my independence as a specialist and declare that neither I nor the Beyond Heritage have any interest, be it business, financial, personal or other, in any proposed activity, application or appeal in respect of which the client was appointed as the EAP, other than fair remuneration for work performed on this project.

SIGNATURE:

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