

Rehab Green cc

Registration No: 2002/094339/23

VAT Reg No: 4600240313

PI Steenekamp

PO Box 12636

Queenswood

0121

Pretoria



Cell: 082 560 0592

Fax: 086 678 1690

E-mail: piet@rehabgreen.co.za

MEMORANDUM

To: Reuben Hydenrych (Zutari); Candice Durr (Zutari)

From: Piet Steenekamp (Rehab Green cc)

Date: 17/8/2022

Subject: Summary of documents related to environmental position statements and planned agro-industrial and commercial development projects of Sibanye Stillwater.

Nine documents were provided to Rehab Green cc to peruse, which would provide background to Sibanye Stillwater's environmental position statements, as well as existing and planned projects that support agricultural, industrial and commercial development. This relates to the outcome of the agricultural agro-ecosystem specialist assessment, done by Rehab Green cc, for the proposed 200MW photovoltaic solar plant as part of Environmental Authorization legislation requirements. It was to be established whether initiatives funded and supported by Sibanye Stillwater contribute to agriculture to an extent that it can be regarded as mitigation or substitution for the loss of agricultural land related to the proposed Sibanye 200 MW photovoltaic solar plant near Westonaria.

The electronic names of the nine documents as received via email on 2/8/2022 is provided below and numbered 1-9:

1. 1623769764-ssw-biodiversity-position-statement-june-2021.pdf
2. 1623770783-ssw-land-position-statement-june-2021.pdf
3. SSW-FS21-Biodiversity-management.pdf
4. SSW-FS21-SLP-summary.pdf
5. ssw-marikana-fact-sheet-vegetable-tunnel-garden-2022.pdf
6. Bokamoso Ba Rona Programme.pdf
7. West Rand SEZ – PRESENTATION.pdf
8. Eskom 2018-19 RCA hearing - Sibanye-Stillwater FINAL.pdf
9. SIP 20c - Embedded Generation National Programme_Sibanye_SIP Status.pdf

There will be referred to the number in front of the mentioned documents in the remainder of the Memorandum. The documents were perused and summarized briefly below:

The first 2 documents contain Sibanye Stillwater's biodiversity and land management position statements. The statements are honorable and in line with sustainable

development. Their recognition statements in terms of soils (Document 2, page 3) as well as their second strategic objective (Document 2, Page 5), that mention conservation and enhancement of the non-renewable soil resource and precautionary approach to environmental impacts to ensure sustainable mine closure is almost unique. The 3rd document focuses on aquatic bio-monitoring results. Biodiversity management and preservation is very crucial because it is threatened by agricultural, industrial, residential and commercial development, which unavoidably encroach on all remaining biodiversity sites. It is feared, and probably certain that the loss of agricultural land will subsequently place more pressure on biodiversity resources. These tie in with one of the recognition statements in Document 2, which states “operational and non-operational land should be managed responsibly considering adjacent and future land uses”. The positive and conserving approach towards environmental impacts within their operations can be mentioned in the Agricultural Agro-ecosystem report for consideration by the Department in their decision on environmental authorization.

Documents 4 and 5 are a summary of 15 social and labour plans in varying stages of implementation of which 11 of the 45 projects are agricultural related. This can be added to the Agricultural Agro-ecosystem Assessment report for consideration by the Department in their decision on environmental authorization.

Document 6 and 7 provide information on the proposed Bokamoso Ba Rona Agri-Industrial and Community development Project. The proposed project appears to be a significant initiative for a country with a down spiraling economy. However the project appears to be in a very early phase and faces major challenges in the current South African economy and global image in terms of the state of governance and political issues.

Uncertainties in the information are that there are different referrals in Document 6 to the size of the agricultural section i.e.

“The BBR Programme is a 30 000-hectare integrated, regenerative agro-industrial and renewable energy development that aspires” versus

“30 000 ha prime agricultural land, donated by Sibanye Stillwater / FWRDWA for agro-industrial development”

It is thus unclear whether the proposed project consists of 30 000 ha that include agriculture, industrial, residential and commercial development (first quote above) and whether the total 30 000 ha are pure agricultural land (latter quote above).

There are no maps that, to a fair extent indicate the extent of the project area although a map on page 29 of Document 7 appears if it can be a preliminary project area. The map however lacks a legend or table that provides at least preliminary proportions of development categories.

Another concern is that the availability of water for irrigation purposes is not emphasized. Without the availability of this resource (in a dry land system), the viability of the proposed project is much more challenging.

Conclusions:


It should be bear in mind that no offset is a real mitigation measure but mostly a commitment to financially support the wellbeing of one resource in order to obtain authorization to sacrifice a similar resource at another location. The end result mostly stays minus 1 of a specific resource or a section thereof.

The proposed Bokamoso Ba Rona project appears to have a potential footprint of 30 000 ha that consists of integrated industrial, residential, commercial and agricultural development initiatives. The inclusion of agriculture in the project is a very valued initiative and will help addressing future challenges in terms of food security in the country. The project is however still in a very early phase and the challenges mentioned on Page 25 in Document 6 indicate that the project struggle to move forward. The agricultural land is however very fragmented already and it is known that residential, industrial and commercial development encroaches unavoidably on agricultural land, especially in already, fairly developed areas. The 1000 ha of prime agricultural land that is currently earmarked for the 200MW solar facility will in fact be the first massive encroachment on agricultural land. The map on page 18 in Document 7 in fact already indicate expansion areas for mining villages that include current highly productive agricultural land.

The construction of the 200MW solar facility on productive agricultural land is not in line with the land management position statement of Sibanye Stillwater in Document 2 and it would also impact negative on the agricultural viability of the Bokamoso Ba Rona project. The size of the proposed Barona project (30 000 ha) just proof the large extent of land available for alternative site selections.

Notwithstanding the statement above, and within the current time constraint situation, it would be very appropriate and definitely an option to motivate any existing agricultural project of a reasonable size, situated on land that might have been lost for future agriculture as a mitigation measure or an offset for the land potentially being lost due to the proposed 200 MW solar facility. It would, however, not be appropriate to state that a proposed project in its early phases, with no existing, actual agricultural benefits or future guaranteed agricultural benefits can serve as a mitigation measure for a serious impact, while it appears that there are large areas for alternative site selections. The statement in the Agricultural Agro-ecosystem report in terms of approval cannot be changed, although the agricultural projects in the social labour plans and even proposed projects can be mentioned to authorities for consideration.

The biodiversity and land use management position statements of Sibanye Stillwater as well as the social and labour plans that include agricultural related projects and the proposed Bakomoso Ba Rona project will be noted in the Agricultural Agro-ecosystem report for consideration by authorities.



P.I. Steenekamp